

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IV

Page 1 of 1

EPA ID: GAD095811162 Site Name: PHOTOCIRCUITS ATLANTA INC

State ID: 34851

Alias Site Names: PHOTOCIRCUITS ATLANTA INC
TOPRI INC

City: PEACHTREE CITY

County or Parish: FAYETTE

State: GA

Refer to Report Dated: 06/01/1989

Report Type: SITE INSPECTION 001

Report Developed by: STATE

DECISION:

☒ 1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

☒ 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)

☐ 1b. Site may qualify for action, but is deferred to:

☐ 2. Further Assessment Needed Under CERCLA:

2a. Priority: ☐ Higher ☐ Lower

2b. Other: (recommended action) NFRAP (No Further Remedial Action Planned)

DISCUSSION/RATIONALE:

This site was incorrectly deferred to RCRA in 1989.

This site was an Environmental Priorities Initiative (EPI) site assigned to GA EPD for assessment per the EPI agreement.

A file review was conducted in November 1999. The June 1989 EPI assessment showed that the site was "NFRAP" due to low score.

The designation of "deferred to RCRA" is hereby changed to "NFRAP."

Site Decision Made by: CAROLYN THOMPSON

Signature: _____

Carolyn Thompson

11/30/99
Date: 06/12/1989

COMPLETE
ENG.

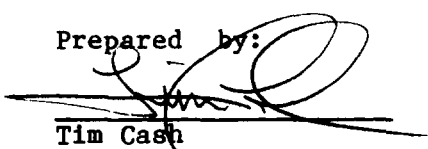
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ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT/RCRA FACILITY ASSESSMENT OF
PHOTOCIRCUITS ATLANTA
ATLANTA, GEORGIA
EPA ID # GAD095811162

GEORGIA ENVIRONMENTAL PROTECTION DIVISION

June 1989

Prepared by:


Tim Cash
Environmental Specialist

Reviewed by:

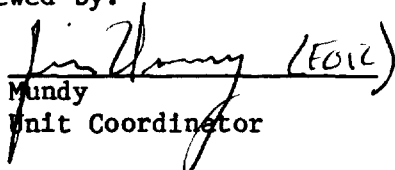
 (FOIL)
Bill Mundy
Unit Coordinator

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1.0 INTRODUCTION

The Georgia Environmental Protection Division, Hazardous Waste Management Program (EPD) conducted a Preliminary Assessment (PA) and a Visual Site Inspection (VSI) at the Photocircuits facility on May 17, 1989. The task was performed as part of the Environmental Priorities Initiative as described in Technical Directive Document (TDD) No. F4-8810-39.

1.1 OBJECTIVE

The major objective of the EPI program is to conduct an on-site and off-site inspection of the assigned facility in order to characterize the Solid Waste Management Units (SWMUs) associated releases and other Areas of Concerns (AOC). The inspection is conducted in a two-phase operation: the Preliminary Review which includes the review and evaluation of specific file documents; and the Visual Site Inspection (VSI) which identifies all SWMUs, known releases, and AOCs.

1.2 SCOPE OF WORK

The scope of this investigation included the following activities:

- a file search of State files in an attempt to obtain and review specific documents that will help characterize the facility,
- development of a detailed site base map to scale including site features, solid waste management unit locations, areas of concern, and photo-documentation areas,
- evaluation of target populations within a 3-mile radius from the site with regard to groundwater, air, and within 15-mile stream distance for surface water,
- a private well survey within a 3-mile radius of the facility,
- photo-documentation of all Solid Waste Management Units (SWMUs) and related releases and exposure pathways,
- inspection and photo-documentation of all Areas of Concern (AOC).

2.0 SITE DESCRIPTION

2.1 SITE LOCATION

The Photocircuits facility is located at 350 Dividend Drive in Peachtree City, Fayette County, Georgia (Figures 1 & 2). The facility's specific geographic location is at 33° 20' 50" North latitude and 84° 34' 45" East longitude.

2.2 SITE FEATURES

The facility is located in an industrial park on approximately 10 acres of predominantly flat, open terrain. The major features of the Photocircuits site are the manufacturing plant and the waste treatment plant building (Figure 2) (Reference 4).

The manufacturing plant houses general offices, all manufacturing activities, shipping and receiving. Waste and virgin product storage are at the rear or west of the manufacturing building and the waste treatment plant building. Activities conducted in the waste treatment plant building consist of treatment of all wastewaters generated by manufacturing at the facility. Approximately 80% of the facility is paved and is used for parking and virgin material/waste storage.

2.3 OWNERSHIP HISTORY

The facility was previously operated as Topri, Incorporated under the ownership of Tokyo Print Industries, Ltd. of Japan. Topri submitted a Notification of Hazardous Waste Activity Form EPA 8700-12 dated August 19, 1980 (Reference 1). By correspondence dated January 11, 1982, Topri advised EPD that it intended to cease operations (Reference 2). Information regarding activities of Topri is very limited since there are no U.S. contacts familiar

with the company's former operations at the facility. Photocircuits Atlanta, a wholly owned subsidiary of Kollmorgen Corporation, submitted EPA Form 8700-12 dated April 7, 1982 indicating ownership and operation of the facility. By correspondence dated September 11, 1986, EPD was advised that Photocircuits Division of Kollmorgen Corporation was to be sold to PC Acquisition Corporation on September 17, 1986 (Reference 3).

2.4 NATURE OF OPERATIONS

Photocircuits Atlanta manufactures printed circuit boards for the electronics industry. Hazardous wastes are generated from cleaning, etching and electroplating operations. The process begins with a non-conductive fiberglass laminate board which undergoes an acid copper electroplate. The copper plated board is then rough and finish sanded, washed with HCl, water rinsed and dried to remove film, grease, and oxidized materials. Circuits are then ink printed onto the cleaned boards. The printed board is dried and then etched in a CuCl/HCl bath leaving copper on the board only under the ink-coated circuit. The ink is then removed using a NaOH wash, exposing the underlying copper circuit. The board is then washed in dilute HCl, water-rinsed and dried. A solder mask is then screened onto the circuit and the board undergoes a FeCl rinse prior to hot air solder levelling. The circuit legend is stencilled onto the back of the board, the surface is cleaned with copper bright and the completed board is packaged for shipment.

The facility generates five waste streams which are described as follows and listed in order of volume generated:

1. Spent Cupric Chloride Solution (D002). This waste stream is generated as a result of etching and plating operations. Spent CuCl is stored in two interconnected fiberglass above ground storage tanks (2,500

gallons and 5,000 gallons) and is pumped from the manufacturing plant via above ground piping. Spent CuCl is recycled between the plating and etching lines and the storage tanks. When the CuCl is no longer suitable for use it is removed from the system by tank truck and manifested to an off-site facility for regeneration.

2. Wastewater treatment sludge (F006). The facility operates a wastewater treatment plant which treats all wastewaters from its manufacturing operations prior to discharge to the Georgia Utilities Company (Peachtree City) sewerage system. The entire system is a wastewater treatment unit as defined in 40 CFR 260.10. Wastewater from manufacturing operations are segregated into metal bearing (etching, plating) and non-metal bearing (acid/alkaline wash and inks). Non-metal bearing wastewater is pH adjusted and undergoes basic treatment prior to discharge while metal bearing wastewater undergoes pH adjustment, precipitation, flocculation and sludge filtration prior to discharge. Flocced and precipitated sludge is filter pressed to extract remaining liquids. The resulting sludge is placed in large plastic bags and stored in the F006 storage area at the rear or western end of the building. The waste is manifested in less-than-90-day intervals to an off-site facility.

3. Rolled solder flux (D008). This waste is generated from the hot air solder levelling operation. The spent solder flux is placed in fifty-five gallon drums and stored at the F006 storage area where it is manifested in less-than-90-day intervals to an off-site facility.

4. General Trash. This waste is generated from paper and plastic packaging, containers and cartons, pallets, etc. Waste is placed in a 30 yard roll-off container at the rear of the manufacturing plant and hauled to a sanitary landfill.

5. Spent Solvents (F001). The facility has a vapor degreaser following the hot air solder levelling operation which uses 1,1-trichloroethane to clean completed boards. Since December 1987, one 55 gallon drum of spent solvent has reportedly been generated from this unit (Reference 7).

2.5 PERMIT AND REGULATORY HISTORY

Photocircuits is currently classified as a generator of hazardous waste. A Part A Application for a Hazardous Waste Facility Permit dated January 21, 1981 was submitted to U.S. EPA Region IV by Topri, Incorporated. The application identified Topri Inc. as the owner and operator of the facility. Hazardous waste management activities identified by the application are summarized in Table 1 (Reference 4). A revised Part A Application dated September 13, 1982 identified Photocircuits Atlanta, Inc. as the new operator and Kollmorgen Corporation as the new owner. Hazardous waste management activities described by the revised Part A were similar to those described by the Topri Part A with the exception of revised estimated annual quantity of wastes (Reference 5). During an inspection by EPD on March 2, 1984, it was determined that the facility's regulatory status was that of a generator rather than a treatment, storage or disposal facility (TSD) and by correspondence dated May 24, 1984, EPD acknowledged Photocircuit's earlier request for withdrawal of its Part A and change in status to generator (References 6 & 7).

Georgia EPD has inspected the facility on May 8, 1980; March 2, 1984; October 19, 1984; February 25, 1988 and June 29, 1988.

During the October 19, 1984 inspection violations of 40 CFR 262.35(a)(4) were observed and a request for corrective measures was made in a November 6, 1984 Notice of Violation (Reference 8). By Compliance Status Letter dated

March 7, 1984, EPD verified that all violations had been eliminated (Reference 9).

On February 25, 1988, an inspection was conducted to investigate an anonymous complaint regarding an alleged hole in a sump receiving influent to the wastewater treatment system (Reference 10). The inspection confirmed that no release had occurred from the subject unit. However, it was observed that some spillage of F006 onto pavement surrounding the F006 storage area had occurred (Reference 11). Numerous violations of 40 CFR 262.34(a)(1), (2), and (4) were observed during the inspection and a request for corrective measures was made in a March 23, 1988 Notice of Violation (Reference 12). On June 29, 1988, an inspection was conducted as a follow-up to the February 25, 1988 inspection and also to assess the facility's compliance with 40 CFR 262.34(a)(1) [40 CFR 265.191] relative to hazardous waste accumulation in tanks. The facility was found to be in compliance with violations observed during the February 25, 1988 inspection. However, numerous violations of the tank standards were observed and a request for corrective measures made in Notice of Violation dated August 18, 1988 (References 13 & 14).

3.0 ENVIRONMENTAL SETTING

3.1 WATER SUPPLY

Potable water within the study area is provided by both public and domestic water supply systems. Public water systems consist of those permitted under the Georgia Safe Drinking Water Act and include both large, publicly-owned water supply systems as well as smaller privately-owned community and non-community water supplies.

Fayette County Water System provides water to approximately 37,010 people. One surface water intake, located topographically downgradient of the facility on Line Creek is within a three mile radius of the facility. The Willow Bend and Log House wells contribute groundwater to the Fayette County Water System on a supplemental basis and are also located within a three mile radius of the facility. Smaller, privately-owned, permitted water supply systems within a three mile radius of the facility use groundwater exclusively as a source and include the Shoal Creek community water supply system located on Georgia Highway 34 west of Fisher Road and the Pitney Bowes Training Center non-community water supply located on Aberdeen Parkway in Peachtree City.

Residences in Fayette County lying outside areas where distribution mains exist within a three mile radius of the facility use domestic wells for drinking water. Residences in Coweta County lying outside those areas served by community water systems also use domestic wells for drinking water (Reference 15).

During the Visual Site Inspection (VSI) conducted on May 17, 1989 a water supply well was discovered at the northernmost corner of the manufacturing plant. A copy of the well log obtained during the VSI shows that the well was drilled in 1986 to a depth of 610 feet, is cased to a depth of 82 feet and had a static water level of 15 feet below land surface. The well currently

provides drinking water to Photocircuits and is also interconnected to the Fayette County Water System.

3.2 SURFACE WATER

The nearest hydraulically downgradient perennial surface water feature is an unnamed tributary to Line Creek which, at its closest point, is about 1,000 feet west of the facility boundary. A small, intermittent drainage feature to the south crosses the facility property boundary at its southernmost edge south of the F006 storage pad. The western half of the facility appears to be built on top of fill with the drainage feature being channelled under the fill through a buried culvert across the site. Surface water run-off would enter storm drain inlets across the facility and flow to the south before entering the intermittent drainage feature south of the F006 storage pad (Reference 15).

3.3 HYDROGEOLOGY

The geologic and hydrogeologic conditions in the study area were researched as part of the site investigation. A preliminary literature review was conducted to determine surface and subsurface geologic conditions, soil character, and the status of groundwater transport and storage.

The facility is located within the Piedmont Physiographic Province. The geology in the area consists principally of metamorphic rock (primarily biotite gneiss and schist) and possibly some igneous rock (primarily granite). Primary porosity and permeability of the metamorphic rock are low; however, structural deformations have produced planes of secondary permeability along which groundwater movement occurs. These secondary permeability zones consist of fault planes, fractures, joints, shear zones,

and planes of schistosity resulting from rock deformation.

Groundwater also occurs under confined or water-table conditions within the residual soils and underlying rock. In some isolated areas, residuum at depth may contain a higher percentage of clay, which can lead to the formation of a saturated lens, above and below which unsaturated conditions exist.

The depth to the permanent water table is highly variable, being dependent on a variety of factors, including surface topography, soil permeability, rainfall/evapotranspiration, and underlying bedrock structure. The water table generally follows the land surface configuration, as a subdued expression of the surface topography. However, the complex geometry of the secondary permeability features typically results in higher anisotropic groundwater flow in bedrock aquifers.

Recharge to the water-table aquifer is direct through the surface soil either by infiltration or rainfall or by seepage from streambeds and surface impoundments. Because of the low permeability of the residual soils, infiltration rates are low and subsequent surface-water runoff high (Reference 16).

3.3.1 Geology

Geologic formations found at the subject site are included in the Atlanta Group of the south Piedmont Lithostratigraphic Province (Reference 17). Rock types in the subject area associated with this group consist primarily of gneiss, schist, amphibolite and granitic gneiss containing biotite, muscovite, quartz and feldspar in order of increasing abundances. The base of the units within the Province are not exposed, therefore their thickness is not known (Reference 18).

Generally, rocks throughout the Province strike northeast and dip southeast; however, local anomalies do occur. Schistosity roughly parallels

structural strike and dip offering conduits for granitic intrusions (Reference 19). Fractures are larger and more numerous near the surface and become narrower and more widely spaced with depth. Generally, areas with large, densely spaced fractures develop thicker layers of saprolite (Reference 18). Quartz and mica schist typically weather to a reddish, sandy soil while amphibolite and hornblende gneiss decompose to a yellow-brown clayey soil (Reference 20).

3.3.2 Soils

Soils at the facility consist of a Cecil sandy loam with 2-6% slopes. Permeabilities associated with this soil type range from less than 10^{-3} cm/sec. to greater than 10^{-5} cm/sec. (Reference 21).

3.3.3 Groundwater

Groundwater in the area is confined to joints, fractures, and contact zones in the crystalline rocks, and pore spaces in the saprolite and alluvium (Reference 18). The amount of stored water depends on the size and distribution of the joints and fractures as well as the thickness and porosity of the overlying residuum. Groundwater is typically found under water table conditions; however, semiconfined conditions can also exist. The aquifer is recharged locally by precipitation which infiltrates (Reference 20). As noted by Cressler "...recharge of the aquifer may be significant in stream valleys, drainages and draws that receive constant recharge from large catchment areas, or in broad flat areas covered by deep saturated soil" (Reference 18).

3.4 CLIMATE AND METEOROLOGY

The mean annual precipitation for the Atlanta Area for the period 1951-1974 was 48.19 inches. Average summer temperature is 77°F and the average winter temperature is 44°F (Reference 21). Mean annual lake

evapotranspiration is 42 inches (Reference 22).

3.5 LAND USE

Land use within a three mile radius consists of commercial, industrial, residential and some agricultural (Reference 15).

3.6 POPULATION DISTRIBUTION

The total population within a three mile radius of the facility is estimated to be 7,000 (Reference 15). Population within a 1 mile, 2 mile and 3 mile radius is estimated at 2,030, 3,500, and 1,470 respectively.

3.7 CRITICAL HABITATS/ENDANGERED SPECIES

No critical habitats were identified within the study area.

The ranges of two endangered species encompass the facility and surrounding vicinity, the red-cockaded woodpecker - Picoides borealis (Viellouf) and the southern bald eagle - Haliaeetus leucocephalus (Linnaeus) (Reference 23).

4.0 VISUAL SITE INSPECTION (VSI)

The Visual Site Inspection of the Photocircuits site was performed May 17, 1989. The VSI focused on the past and present waste streams at the facility in order to identify all Solid Waste Management Units (SWMUs) and to collect information beneficial in assessing their potential to release hazardous waste or constituents to the environment.

4.1 SOLID WASTE MANAGEMENT UNITS

Four SWMU's were evaluated during the VSI and are identified on Figure 3 and Table 1.

The VSI was conducted on May 17, 1989. The inspection began with an entrance interview with Wendell Quakenbush and Joe Wilkeyson to explain the purpose of the inspection and to outline data needs. Mr. Quakenbush described the manufacturing process, identified waste streams and identified physical locations of SWMUs on a site sketch. Hazardous Waste Manifests were reviewed for 1988 and 1989 to determine waste characteristics and quantities for that time period. A visual inspection at the entire facility was conducted to evaluate each SWMU.

TABLE 2

SOLID WASTE MANAGEMENT UNITS

PHOTOCIRCUITS ATLANTA, INC.

FAYETTE COUNTY, GEORGIA

<u>Location Number (Fig. 2)</u>	<u>Name</u>	<u>RCRA Regulated</u>	<u>Status</u>
1	Former Drum Storage Area	Yes	Inactive
2	Waste Treatment Plant	No	Active
3	F006 Storage Pad	Yes	Active
4	Waste CuCl Storage	Yes	Active

SWMU NUMBER: 1

SWMU NAME: Former Drum Storage Area

SWMU DESCRIPTION: This unit is shown on the Photocircuits Part A application dated September 13, 1982 as being located northeast of the Waste Treatment Plant. The Part A shows the dimensions of the unit to be 40' x 40'. No other construction information is available.

DATE OF START-UP: Unknown.

DATE OF CLOSURE: According to Mr. Quakenbush, this unit was paved over during an expansion of the Waste Treatment Plant and parking lot. No physical evidence exists. No dates for the expansion and construction were known.

WASTES MANAGED: No documentation is available indicating what types of waste were stored in this unit, although the Photocircuits Part A application indicates F001, F002, F006, F007, F008 and F009 wastes were stored in drums at the facility.

RELEASE CONTROLS: Unknown.

RELEASE HISTORY: None.

PHOTOGRAPH NO.: 1.1

SWMU NUMBER: 2

SWMU NAME: Waste Treatment Plant

SWMU DESCRIPTION: This unit treats all process wastewaters generated by the facility as described in Section 2.4.2. The entire treatment process occurs in tanks with secondary containment and is contained under a roofed structure with walls.

DATE OF START-UP: Exact date of start-up is unknown but was operated by Topri as early as August 1980.

DATE OF CLOSURE: Unit is still active.

WASTES MANAGED: Wastes treated are primarily both metal and non-metal bearing acid and alkaline wastewaters generated from facility manufacturing operations. Primary metals of concern are copper from etching and plating operations and lead from hot air soldering operation.

RELEASE CONTROLS: All wastes are managed in tanks with secondary containment.

RELEASE HISTORY: None.

PHOTOGRAPH NO.: 1.1

SWMU NUMBER: 3

SWMU NAME: F006 Storage Pad

SWMU DESCRIPTION: This unit is used for the storage of filter cake sludge designated as F006 hazardous waste, spent rolled solder flux designated as D008 hazardous waste and spent lubricating oils. The unit consists of a monolithic reinforced concrete slab with curbing on three sides. On the north side of the unit is ramped for forklift access. The unit is surrounded with chainlink fence.

DATE OF START-UP: Unknown.

DATE OF CLOSURE: Active.

WASTES MANAGED: F006, D008, waste oil.

RELEASE CONTROLS: The unit is equipped with concrete curbing and flooring.

RELEASE HISTORY: None.

PHOTOGRAPH NO.: 1.2

SWMU NUMBER: 4

SWMU NAME: Waste CuCl Storage

SWMU DESCRIPTION: This unit consists of two 2,500 gallon and 5,000 gallon capacity each above ground tanks used for the storage of waste and virgin CuCl solution. The tanks are equipped with secondary containment although feed pipes are not.

DATE OF START-UP: Exact date unknown although tanks are reported to have been used as early as 1980.

DATE OF CLOSURE: Active.

WASTES MANAGED: CuCl solution, corrosive liquid, D002.

RELEASE CONTROLS: Secondary containment.

RELEASE HISTORY: None.

PHOTOGRAPH NO.: 1.3

REFERENCES

1. Notification of Hazardous Waste Activity, August 19, 1980; Photocircuits Files, Generator Compliance Unit, Georgia Environmental Protection Division.
2. Correspondence, January 11, 1982; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
3. Correspondence, September 11, 1986; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
4. Part A Application, January 21, 1981; Photocircuits, Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
5. Part A Application, January 21, 1981; Topri Inc., Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
6. Trip Report, March 2, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
7. Correspondence, May 24, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
8. Notice of Violation, November 6, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
9. Compliance Status Letter, March 7, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
10. Complaint Record 8-008, January 29, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
11. Trip Report, March 24, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
12. Notice of Violation, March 23, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
13. Trip Report, August 18, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
14. Notice of Violation, August 18, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
15. U.S. Geologic Survey, 7.5 minute series topographic quadrangles; Tyrone, 1982; Madras, 1983; Sharpsburg, 1982, Senoia, 1982.
16. Seitzingers Part B Permit Application, Land Disposal Unit, Georgia Environmental Protection Division.

17. Higgins, M. W. and R. L. Atkins, 1981, The Stratigraphy of the Piedmont Southeast of the Brevard Zone in the Atlanta, Georgia Area in Wigley, P.B., ed., Latest Thinking on the Stratigraphy of Selected Areas in Georgia: Georgia Geologic Survey Information Circular 54-A, p. 40.
18. Cressler, C. W., C. J. Thurmond, and W. G. Hester, 1983; Groundwater in the Greater Atlanta Region, Georgia: Georgia Geologic Survey Information Circular 63.
19. McConnell, K. I. and C. E. Abrams, 1984; Geology of the Greater Atlanta Region, Georgia: Geologic Survey, Bulletin 96.
20. Herrick, S. M. and H. E. LeGrand, 1949; Geology and Groundwater Resources of the Atlanta Area, Georgia: Georgia Geologic Survey Bulletin 77.
21. Soil Survey of Clayton, Fayette and Henry Counties, Georgia, U.S.D.A. Soil Conservation Service, 1979.
22. Climatic Atlas of the United States, U. S. Department of Commerce, National Climatic Center, Ashville, North Carolina, 1979.
23. Georgia's Protected Wildlife, Georgia Department of Natural Resources, September, 1987.

TABLE 1
PART A SUMMARY
TOPRI, INC.
JANUARY 21, 1981

EPA Waste Code	Estimated Annual Quantity (lbs)	Method of Storage/Treatment	
		Container (S01)	Tank (S02)
F001	2,000	X	X (T04*)
F002	13,000	X	X (T04*)
F006	426,000	X	
F007	20,000		X
F008	64,000	X	X (T01**)
F009	174,000		X (T01)

* T04 - indicates "other" type of treatment (distillation)

** T01 - indicates treatment in tank



PHOTOCIRCUITS ATLANTA, INC.

FIGURE 1

TYRONE, GA.
N3322 5—W8430/7.5

1965
PHOTOREVISED 1982
DMA 4080 I NE-SERIES V845

(PROPERTY BOUNDARY) 745.15'

PHOTOCIRCUITS ATLANTA, INC.
SITE SKETCH
(NO SCALE)



SWMU NO. 3
FOO6 STORAGE PAD

SWMU NO. 4
WASTE CUCL STORAGE

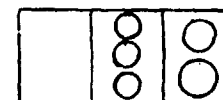
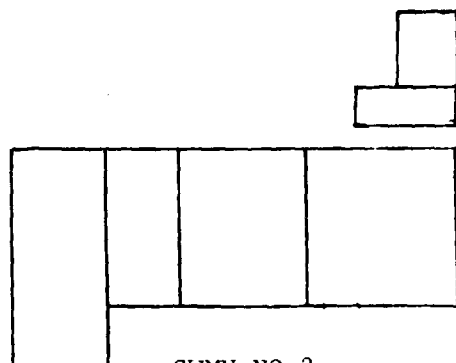
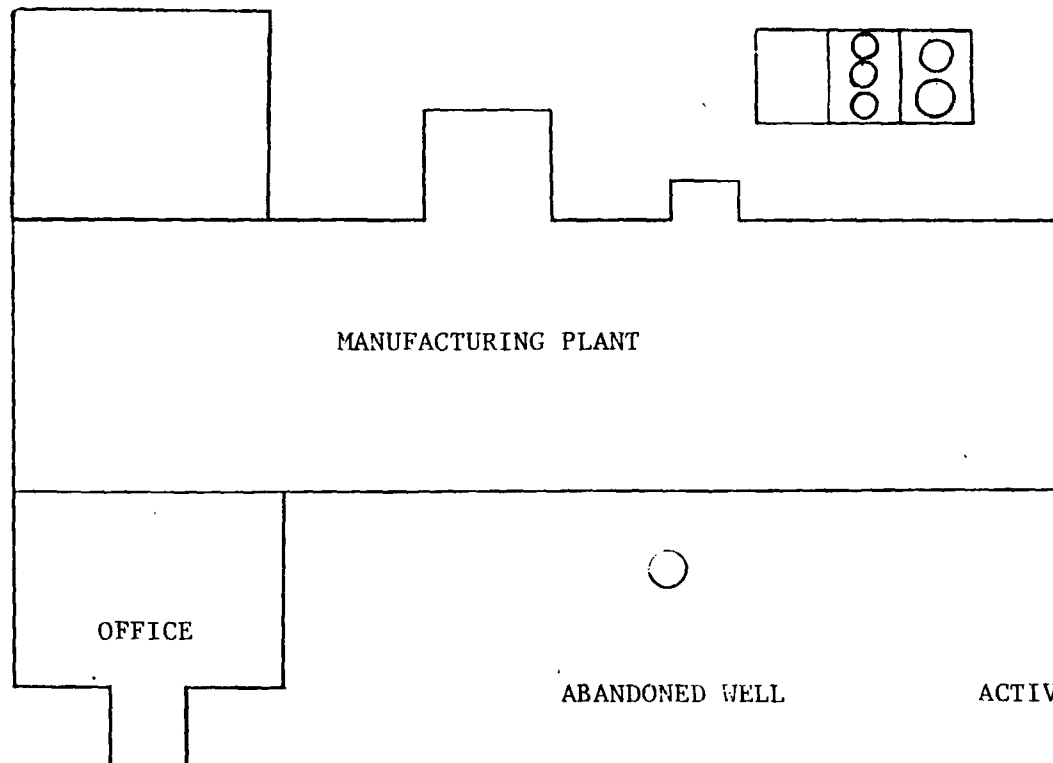


FIGURE 2



SWMU NO. 2
WASTE TREATMENT PLANT

SWMU NO. 1
FORMER DRUM STORAGE AREA



MANUFACTURING PLANT

OFFICE

ABANDONED WELL

ACTIVE WELL

745.15'

585.0'

UNSCANNABLE

MEDIA

(PHOTOGRAPHS)

Facility name: Photocircuits Atlanta

Location: 350 Dividend Drive, Peachtree City, Georgia 30269

EPA Region: IV

Person(s) in charge of the facility: Wendell Quakenbush

Charles R. Marquardt

Name of Reviewer: Tim Cash

Date: June 6, 1989

General description of the facility:

(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

Photocircuits Atlanta is located at 350 Dividend Drive in Peachtree City, Fayette County, Georgia. The facility manufactures printed circuit boards for the electronics industry and generates wastewater treatment sludges from electroplating operations (F006), corrosive liquids from etching and cleaning operations and spent plating baths (D002) and chlorinated solvents used in degreasing (F001). A small release of F006 was observed by EPD at the facility on February 25, 1988. All wastes are handled in tanks and containers.

Scores: $S_M = 21.134$ $(S_{gw} = 31.293 S_{sw} = 18.909 S_a = NA)$
 $S_{FE} = 0$
 $S_{DC} = 0$

Ground Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi-plier	Score	Max. Score	Ref. (Section)	
1 Observed Release	0 45	1	0	45	3.1	
If observed release is given a score of 45, proceed to line 4 . If observed release is given a score of 0, proceed to line 2 .						
2 Route Characteristics					3.2	
Depth to Aquifer of Concern	0 1 2 3	2	6	6		
Net Precipitation	0 1 2 3	1	2	3		
Permeability of the Unsaturated Zone	0 1 2 3	1	3	3		
Physical State	0 1 2 3	1	3	3		
Total Route Characteristics Score			15	15		
3 Containment	0 1 2 3	1	1	3	3.3	
4 Waste Characteristics					3.4	
Toxicity/Persistence	0 3 6 9 12 15 18	1	18	18		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1	18	8		
Total Waste Characteristics Score			26	26		
5 Targets					3.5	
Ground Water Use	0 1 2 3	3	6	9		
Distance to Nearest Well/Population Served	0 4 8 8 10 12 16 18 20 24 30 32 35 40	1	40	40		
Total Targets Score			46	49		
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5			17,940	57,330		
7 Divide line 6 by 57,330 and multiply by 100			S _{gw} = 31.293			

MAXED
MAXED

MAXED

GROUND WATER ROUTE WORK SHEET

Surface Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)		Multi-plier	Score	Max. Score	Ref. (Section)
1 Observed Release	0	45	1	0	45	4.1
If observed release is given a value of 45, proceed to line 4 . If observed release is given a value of 0, proceed to line 2 .						
2 Route Characteristics						4.2
Facility Slope and Intervening Terrain	0	1	2	3	1	0 3
1-yr. 24-hr. Rainfall	0	1	2	3	1	3 3
Distance to Nearest Surface Water	0	1	2	3	2	6 6
Physical State	0	1	2	3	1	3 3
Total Route Characteristics Score				12	15	
3 Containment	0	1	2	3	1	1 3 4.3
4 Waste Characteristics						4.4
Toxicity/Persistence	0	3	6	9	12	15 18 18
Hazardous Waste Quantity	0	1	2	3	4	5 6 7 8 18 8
Total Waste Characteristics Score				26	28	
5 Targets						4.5
Surface Water Use	0	1	2	3	3	9 9
Distance to a Sensitive Environment	0	1	2	3	2	0 6
Population Served/Distance to Water Intake Downstream	0	4	6	8	10	12 18 18 20 30 40
Total Targets Score				39	55	
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5				12,168	64,350	
7 Divide line 6 by 64,350 and multiply by 100				S _{sw} = 18.909		

SURFACE WATER ROUTE WORK SHEET

Air Route Work Sheet					
Rating Factor	Assigned Value (Circle One)	Multi-plier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 45	1		45	5.1
Date and Location:					
Sampling Protocol:					
If line 1 is 0, the $S_a = 0$. Enter on line 5 . If line 1 is 45, then proceed to line 2 .					
2 Waste Characteristics					5.2
Reactivity and Incompatibility	0 1 2 3	1		3	
Toxicity	0 1 2 3	3		9	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score				20	
3 Targets					5.3
Population Within 4-Mile Radius	0 9 12 15 18 21 24 27 30	1		30	
Distance to Sensitive Environment	0 1 2 3	2		6	
Land Use	0 1 2 3	1		3	
Total Targets Score				39	
4 Multiply 1 x 2 x 3				35,100	
5 Divide line 4 by 35,100 and multiply by 100			$S_a =$		

AIR ROUTE WORK SHEET

Direct Contact Work Sheet						
Rating Factor	Assigned Value (Circle One)		Mult- plier	Score	Max. Score	Ref. Section
[1] Observed Incident	0	45	1		45	B.1
If line [1] is 45, proceed to line [6] If line [1] is 0, proceed to line [2]						
[2] Accessibility	0	1 2 3	1		3	B.2
[3] Containment	0	15	1		15	B.3
[4] Waste Characteristics Toxicity	0	1 2 3	5		15	B.4
[5] Targets						B.5
Population Within a 1-Mile Radius	0	1 2 3 4 5	4		20	
Distance to a Critical Habitat	0	1 2 3	4		12	
				Total Targets Score		32
[6] If line [1] is 45, multiply [1] x [4] x [5] If line [1] is 0, multiply [2] x [3] x [4] x [5]					21,600	
[7] Divide line [6] by 21,600 and multiply by 100				SOC =		

Fire and Explosion Work Sheet						
Rating Factor	Assigned Value (Circle One)		Multi- plier	Score	Max. Score	Ref. (Section)
1 Containment	1	3	1		3	7.1
2 Waste Characteristics						7.2
Direct Evidence	0	3	1		3	
Ignitability	0	1 2 3	1		3	
Reactivity	0	1 2 3	1		3	
Incompatibility	0	1 2 3	1		3	
Hazardous Waste Quantity	0	1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score					20	
3 Targets						7.3
Distance to Nearest Population	0	1 2 3 4 5	1		5	
Distance to Nearest Building	0	1 2 3	1		3	
Distance to Sensitive Environment	0	1 2 3	1		3	
Land Use	0	1 2 3	1		3	
Population Within 2-Mile Radius	0	1 2 3 4 5	1		5	
Buildings Within 2-Mile Radius	0	1 2 3 4 5	1		5	
Total Targets Score					24	
4 Multiply 1 x 2 x 3					1.440	
5 Divide line 4 by 1.440 and multiply by 100					SEE =	

FIRE AND EXPLOSION WORK SHEET

	s	s ²
Groundwater Route Score (S _{gw})	31.293	979.252
Surface Water Route Score (S _{sw})	18.909	357.550
Air Route Score (S _a)	NA	NA
$s_{gw}^2 + s_{sw}^2 + s_a^2$		1336.802
$\sqrt{s_{gw}^2 + s_{sw}^2 + s_a^2}$		32.562
$\sqrt{s_{gw}^2 + s_{sw}^2 + s_a^2} / 1.73 = S_M =$		21.134

WORKSHEET FOR COMPUTING S_M

NARRATIVE SUMMARY
PHOTOCIRCUITS ATLANTA
350 DIVIDEND DRIVE
PEACHTREE CITY, GEORGIA

Photocircuits Atlanta is located at 350 Dividend Drive, Peachtree City, Fayette County, Georgia about 30 miles south of Atlanta, Georgia. The facility manufactures printed circuit boards for the electronics industry. Wastes generated as a result of the manufacturing process include wastewater treatment sludges from electroplating operations (F006), corrosive wastes from etching and cleaning operations and spent plating baths (D002) and spent halogenated solvents from degreasing operations (F001). Wastes are stored in tanks, sacks and containers prior to off-site management at a permitted hazardous waste facility.

The facility was previously operated as Topri, Incorporated under the ownership of Tokyo Print Industries Ltd. of Japan. Topri submitted a Notification of Hazardous Waste Activity Form EPA 8700-12 dated August 19, 1980 (Reference 19). By correspondence dated January 11, 1982, Topri advised the Georgia Environmental Protection Division (EPD) that it intended to cease operations (Reference 12).

Information regarding activities of Topri is very limited since there are no U.S. contacts familiar with the company's former operations at the facility.

Photocircuits Atlanta, a wholly owned subsidiary of Kollmorgen, submitted an EPA Form 8700-12 dated April 7, 1982 indicating ownership and operation of the facility. Photocircuits also submitted a Part A application for a Hazardous Waste Facility Permit dated September 13, 1982. The Part A indicated storage of hazardous wastes F001, F002, F006, F007, F008, and F009 in tanks and containers (Reference 20). Following a request by Photocircuits and a March 2, 1984 inspection by EPD (Reference 21) the facility's Part A application was withdrawn by correspondence dated May 24, 1984 from EPD (Reference 22). By correspondence dated September 11, 1986, EPD was advised that Photocircuits Division of Kollmorgen Corporation was to be sold to PC Acquisition Corporation on September 17, 1986 (Reference 23).

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Author:
Date:

DOCUMENTATION RECORDS
FOR
HAZARD RANKING SYSTEM

INSTRUCTIONS: As briefly as possible summarize the information you used to assign the score for each factor (e.g., "Waste quantity = 4,230 drums plus 800 cubic yards of sludges"). The source of information should be provided for each entry and should be a bibliographic-type reference. Include the location of the document.

FACILITY NAME: Photocircuits Atlanta

LOCATION: 350 Dividend Drive
Peachtree City, Fayette County, Georgia 30269

DATE SCORED: May 26, 1989

PERSON SCORING: Tim Cash

PRIMARY SOURCE(S) OF INFORMATION (e.g., EPA region, state, FIT, etc.):

EPA, Region IV; GAEPD

FACTORS NOT SCORED DUE TO INSUFFICIENT INFORMATION:

Air route was not scored due to the absence of air sampling data.

COMMENTS OR QUALIFICATIONS: None

QA Review Draft: First Revision

Author:

Date:

GROUND WATER ROUTE

1 OBSERVED RELEASE 0

Contaminants detected (5 maximum):

Rationale for attributing the contaminants to the facility:

* * *

2 ROUTE CHARACTERISTICS

Depth to Aquifer of Concern

Name/description of aquifer(s) of concern:

Aquifer of concern is generally described as unconfined water table aquifer of the South Piedmont Lithostratigraphic Province. (Reference 4)

Depth(s) from the ground surface to the highest seasonal level of the saturated zone (water table(s) of the aquifer(s) of concern:

Depth to seasonal high water table in immediate vicinity is unknown. Range of values reported throughout the area encompassed by a 3 mile radius is 15 feet to 40 feet. (Reference 4, Reference 13)

Depth from the ground surface to the lowest point of waste disposal/storage:

0. All waste storage is above ground.

Name/descriptions of aquifers of concern:

The facility is located within the Piedmont Physiographic Province. (Reference 1) The geology in the area consists principally of metamorphic rock (primarily granite). Primary porosity and permeability of the metamorphic rock are low; however, structural deformations have produced planes of secondary permeability along which groundwater movement occurs. These secondary permeability zones consist of fault planes, fracture, joints, shear zones, and planes of schistosity resulting from rock deformation.

Groundwater also occurs under unconfined or water-table conditions within the residual soils and underlying rock. In some isolated areas, residuum at depth may contain a higher percentage of clay, which can lead to the formation of a saturated lens, above and below which unsaturated conditions exist.

The depth to the permanent water table is highly variable, being dependent on a variety of factors, including surface topography, soil permeability, rainfall/evapotranspiration, and underlying bedrock structure. The water table generally follows the land surface configuration, as a subdued expression of the surface topography. However, the complex geometry of the secondary permeability features typically results in higher anisotropic groundwater flow in bedrock aquifers.

Recharge to the water-table aquifer is direct through the surface soil either by infiltration of rainfall or by seepage from streambeds and surface impoundments. Because of the low permeability of the residual soils, infiltration rates are low and subsequent surface-water runoff are high (Reference 2).

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Date:

Geologic formations found at the subject site are included in the Atlanta Group of the South Piedmont Lithostratigraphic Province (Reference 3). Rock types in the subject area associated with this group consist primarily of gneiss, schist, amphibolite and granitic gneiss containing biotite, muscovite, quartz and feldspar in order of increasing abundances. The base of the units within the Province are not exposed, therefore their thickness is not known (Reference 4).

Generally, rocks throughout the Province strike northeast and dip southeast; however, local anomalies do occur. Schistosity roughly parallels structural strike and dip offering conduits for granitic intrusions (Reference 5). Fractures are larger and more numerous near the surface and become narrower and more widely spaced with depth. Generally, areas with large, densely spaced fractures develop thicker layers of saprolite (Reference 4). Quartz and mica schist typically weather to a reddish, sandy soil while amphibolite and hornblende gneiss decompose to a yellow-brown clayey soil (Reference 6).

Groundwater in the area is confined to joints, fractures, and contact zones in the crystalline rocks, and pore spaces in the saprolite and alluvium (Reference 4). The amount of stored water depends on the size and distribution of the joints and fractures as well as the thickness and porosity of the overlying residuum. Groundwater is typically found under water table conditions; however, semiconfined conditions can also exist. The aquifer is recharged locally by precipitation which infiltrates (Reference 6). As noted by Cressler, "...recharge of the aquifer may be significant in stream valleys, drainages and draws that receive constant recharge from large catchment areas, or in broad flat areas covered by deep saturated soil" (Reference 4, page 16).

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Author:
Date:

Net Precipitation

Value = 3

Mean annual or seasonal precipitation (list months for seasonal):

The mean annual precipitation for the Atlanta Area (Hartsfield International Airport) for the period 1951-1974 was 48.19 inches (Reference 7).

Mean annual lake or seasonal evaporation (list months for seasonal):

42 inches (Reference 8).

Net precipitation (subtract the above figures):

Net prec. = 48.19 - 42
= + 6.19

Permeability of Unsaturated Zone Value = 2

Soil type in unsaturated zone:

Cecil Series (Cecil sandy loam, 2-6% slope) (Reference 7).

Permeability associated with soil type:

10^{-3} 10^{-5} cm/sec (Reference 9).

Physical State Value = 3

Physical state of substances at time of disposal (or at present time for generated gases):

Physical state of wastes at facility consisted of the following in order of volume generated:

Physical State
liquid

Waste Code
D002

Description
Corrosive liquid wastes consisting of cupric chloride, copper sulfate and ammoniated copper.

sludge

F006

Sludges generated from treatment of wastewater from electroplating operation.

liquid

D008

Spent flux from tin-lead soldering

liquid

F001, F002

Spent methylene chloride and 1,1,1-trichloroethane.

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Author:
Date:

3 CONTAINMENT

Containment Value = 1

Method(s) of waste or leachate containment evaluated:
Containers

Method with highest score:

4 WASTE CHARACTERISTICS

Toxicity and Persistence Matrix Score = 3

Compound(s) evaluated:

D002	18 (Reference 10, Reference 11)
F006	18
D008	18
F001	12
F002	12

Compound with highest score:

D002* *D002 is assumed to be primary compound of concern due to its predominance in terms of volume generated and likelihood to migrate via surface or groundwater as a result of a release.

Hazardous Waste Quantity Value = 8

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

8,450,969 pounds (Reference 16, Reference 17, Reference 24).

4225 Tons > 2500T Value=8

Basis of estimating and/or computing waste quantity:

Waste quantity estimated from information obtained from manifests, annual reports, inspection reports and interviews with plant officials. Wastes generated are assumed to be representative of volume and type of other hazardous substances handled at the facility (i.e., virgin material and commercial chemical product use is equivalent to waste generated.)

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Author:

Date:

Total Quantity of Hazardous Substances at the Facility:

Photocircuits Atlanta, Inc.
Hazardous Waste Generation
(in pounds)

WASTE	D002*	D008	F001	F002	F006
Physical State	Liquid	Liquid	Liquid	Liquid	Sludge
1980 ¹	399,840*		5,000	30,000	109,956**
1981 ²	146,000				364,000
1982	94,752				470,000
1983	552,000				98,764
1987	1,185,312	41,284			653,926
1988 ³	1,179,671				894,520
1989 ³	1,189,524	420,420			616,000
Total	4,747,099	461,704	5,000	30,000	3,207,166 = 8,450,969

* Includes all copper solutions characterized as corrosive (cupric chloride, copper-sulfate, ammoniated copper)

** Assumed 8.33 lbs/gallon.

1 Reference 16

2 Reference 17

3 Obtained from manifests during inspection on May 17, 1989 (Reference 24)

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Author:

Date:

5 TARGETS

Ground Water Use Value = 2

Primary use for the aquifer of concern within a three mile radius of the facility is for drinking. Wells within the study area are used as domestic and public drinking water sources (Reference 13).

Distance to Nearest Well Value = 4

Location of nearest well drawing from aquifer of concern or occupied building not

A water supply well is located at the northern corner of the manufacturing plant building. The well was drilled in 1986 to a depth of 610 feet, is cased to a depth of 82 feet and, at the time of installation, had a static water level of 15 feet below land surface. The well currently provides drinking water to the facility and is interconnected to Fayette County Water System. The well was installed to replace an abandoned well approximately 200 feet to the southeast.

Distance to above well or building:

15 feet (Reference 24).

Population Served by Ground Water Wells Within a 3-Mile Radius Value = 5

Identify water-supply well(s) drawing from aquifer(s) of concern within a 3-mile radius and populations served by each:

37,625. The Willow Bend and Log House wells provide groundwater to the Fayette County Water System which served an estimated 37,010 people, although the wells serve only as supplements to the Fayette County Water System. Residences lying outside areas where distribution mains exist in Fayette County were assumed to be served by groundwater. All residences in Coweta County within the area of concern are served by groundwater (community and non-community water supply or domestic wells) since there are no surface water distribution mains within the area of concern in Coweta County (Reference 13).

Computation of land area irrigated by supply well(s) drawing from aquifer(s) of concern within a 3-mile radius, and conversion to population (1.5 people per acre):

None

Total population served by groundwater within a 3-mile radius:

37,625

SURFACE WATER ROUTE

1 OBSERVED RELEASE = 0

Contaminants detected in surface water at the facility or downhill from it (5 maximum):

Rationale for attributing the contaminants to the facility:

* * *

2 ROUTE CHARACTERISTICS

Facility Slope and Intervening Terrain Value = 0

Average slope of facility in percent:

$$\% \text{ Average terrain} = \frac{840 \text{ feet msl} - 820 \text{ feet msl}}{745} \times 100 = 3\%$$

Name/description of nearest downslope surface water: Unnamed tributary to Line Creek

Average slope of terrain between facility and above-cited surface water body in percent:

$$\% \text{ Average terrain slope} = \frac{840 \text{ feet msl} - 800 \text{ feet msl}}{1,000 \text{ feet}} \times 100 = 3\%$$

Is the facility located either totally or partially in surface water? No

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Author:

Date:

Is the facility completely surrounded by areas of higher elevation? No

1-Year 24-Hour Rainfall in Inches Value = 3

3.25 inches (Reference 15)

Distance to Nearest Downslope Surface Water Value = 3

1,000 feet

Physical State of Waste Value = 3

liquid
solids
sludge

* * *

3 CONTAINMENT Value = 1

Containment

Method(s) of waste or leachate containment evaluated:
containers

Method with highest score:

Containers. F006 storage has containment curbs on three sides with ramp on one side for vehicle access.

4 WASTE CHARACTERISTICS

Toxicity and Persistence Matrix Score = 18

Compound(s) evaluated

D002	18 (Reference 10, Reference 11)
F006	18
D008	18
F001	12
F002	12

Compound with highest score:

D002
F006
D008

Hazardous Waste Quantity Value = 8

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

8,540,969 pounds (Reference 16, Reference 17, Reference 24)

Basis of estimating and/or computing waste quantity:

Waste quantity estimated from information obtained from annual reports, inspection reports and interviews with plant officials. Wastes generated are assumed to be representative of volume and type of other hazardous substances handled at the facility (i.e. virgin material and commercial chemical product use is roughly equivalent to waste generated.)

* * *

5 TARGETS

Surface Water Use Value = 3

Use(s) of surface water within 3 miles downstream of the hazardous substance:
Drinking water (Reference 13).

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Author:
Date:

Total Quantity of Hazardous Substances at the Facility:

Refer to page 4-A

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Author:

Date:

Is there tidal influence? No

Distance to a Sensitive Environment Value = 0

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

NA

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:

NA

Distance to critical habitat of an endangered species or national wildlife refuge, if 1 mile or less:

NA

Population Served by Surface Water Value = 30

Location(s) of water-supply intake(s) within 3 miles (free-flowing bodies) or 1 mile (static water bodies) downstream of the hazardous substance and population served by each intake:

Fayette County Water System maintains a surface water intake on Line Creek approximately 9,000 stream feet to the southeast of the facility. Migration via surface water would be expected to travel approximately 1,000 feet prior to reaching an unnamed tributary, approximately 6,000 stream feet prior to reaching confluence with Line Creek and an additional 2,000 stream feet prior to entering the surface water intake.

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Author:

Date:

Computation of land area irrigated by above-cited intake(s) and conversion to population (1.5 people per acre):

No information available.

Total population served:

37,010 (Reference 13)

Name/description of nearest of above-cited water bodies:

Line Creek

Distance to above-cited intakes, measured in stream miles.

Distance from hazardous substances to unnamed tributary to Line Creek: 1,000 feet

Distance from point of entry into unnamed tributary to Line Creek to Fayette County Water System Line Creek intake: 8,000 (Reference 13).

QA Review Draft: First Revision

Author:

Date:

AIR ROUTE

1 OBSERVED RELEASE Not ranked

Contaminants detected:

Date and location of detection of contaminants

Methods used to detect the contaminants:

Rationale for attributing the contaminants to the site:

* * *

2 WASTE CHARACTERISTICS

Reactivity and Incompatibility

Most reactive compound:

Most incompatible pair of compounds:

QA Review Draft: First Revision

Author:
Date:

Toxicity

Most toxic compound:

Hazardous Waste Quantity

Total quantity of hazardous waste:

Basis of estimating and/or computing waste quantity:

* * *

3 TARGETS

Population Within 4-Mile Radius

Circle radius used, give population, and indicate how determined:

0 to 4 mi

0 to 1 mi

0 to 1/2 mi

0 to 1/4 mi

Distance to a Sensitive Environment

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:

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Author:

Date:

Distance to critical habitat of an endangered species, if 1 mile or less:

Land Use

Distance to commercial/industrial area, if 1 mile or less:

Distance to national or state park, forest, or wildlife reserve, if 2 miles or less:

Distance to residential area, if 2 miles or less:

Distance to agricultural land in production within past 5 years, if 1 mile or less:

Distance to prime agricultural land in production within past 5 years, if 2 miles or less:

Is a historic or landmark site (National Register of Historic Places and National Natural Landmarks) within the view of the site?

REFERENCES

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9. Davis, S. N., Porosity and Permeability of Natural Materials in Flow-Through Porous Media, R.J.M DeWest Ed., Academic Press, New York, 1969; Freeze, R.A. and J. A. Cherry, Groundwater, Prentice-Hall, Inc., New York, 1979.
10. Sax, N.I., Dangerous Properties of Industrial Materials, Van Nostrand, Reinhold Company, New York 5th edition, 1979.
11. JRB Associates, Inc., Methodology for Rating the Hazard Potential of Waste Disposal Sites, May 5, 1980.
12. Correspondence, January 11, 1982; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
13. Fayette And Coweta County Water System Water Supply Program Files, Georgia Environmental Protection Division, Jim Banks (contact).
14. 1980 Census Data, United States Census Bureau.
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16. Facility Information Report, July 7, 1980, Topri Inc. File, Generator Compliance Unit, Georgia Environmental Protection Division.
17. Annual Reports, Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
18. Trip Report, March 24, 1988; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
19. Notification of Hazardous Waste Activity, August 19, 1980; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
20. Part A Application, September 13, 1982; Topri Inc., Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
21. Trip Report, March 2, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
22. Correspondence, May 24, 1984; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
23. Correspondence, September 11, 1986; Photocircuits File, Generator Compliance Unit, Georgia Environmental Protection Division.
24. Site Inspection, May 17, 1989, Georgia Environmental Protection Division.

RECONNAISSANCE CHECKLIST FOR HRS2 CONCERNS

Instructions: Obtain as much "up front" information as possible prior to conducting fieldwork. Complete the form in as much detail as you can, providing attachments as necessary. Cite the source for all information obtained.

Site name: Photocircuits Atlanta, Inc.

City, County, State: Peachtree City, Fayette County, Georgia

EPA ID No.: GAD095811162

Person responsible for form: Tim Cash

Date: May 17, 1989

Air Pathway

Describe any potential air emission sources onsite:

NA

Identify any sensitive environments within 4 miles:

NA

Identify the maximally exposed individual (nearest residence or regularly occupied building - workers do count):

NA

Groundwater Pathway

Identify any areas of karst terrain:

None

Identify additional population due to consideration of wells completed in overlying aquifers to the AOC:

None

Do significant targets exist between 3 and 4 miles from the site? Yes

Is the AOC a sole source aquifer according to Safe Drinking Water Act? (i.e. is the site located in Dade, Broward, Volusia, Putnam, or Flagler County, Florida) Yes

Surface Water Pathway

Are there intakes located on the extended 15-mile migration pathway?

Yes

Are there recreational areas, sensitive environments, or human food chain targets (fisheries) along the extended pathway?

No

Onsite Exposure Pathway

Is there waste or contaminated soil onsite at 2 feet below land surface or higher?

No

Is the site accessible to non-employees (workers do not count)?

Yes

Are there residences, schools, or daycare centers onsite or in close proximity?

No

Are there barriers to travel (e.g., a river) within one mile?

No



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D095811162

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Photocircuits Atlanta, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 350 Dividend Dr.			
03 CITY Peachtree City	04 STATE GA	05 ZIP CODE 30269	06 COUNTY Fayette	07 COUNTY CODE 113	08 CONG DIST 06
09 COORDINATES LATITUDE 3 3 2 0 5 0 . N		LONGITUDE 0 8 4 3 4 4 5 . E			

10 DIRECTIONS TO SITE (Starting from nearest public road)

From Atlanta, I-85 south to SR 54 south to Kelly Dr. Right
Cross railroad tracks to Dividend Drive left to Photocircuits
on right.

III. RESPONSIBLE PARTIES

01 OWNER (if known) PC Acquisition Corp.		02 STREET (Business, mailing, residential) 31 Sea Cliff Avenue			
03 CITY Glen Cove	04 STATE NY	05 ZIP CODE 11542	06 TELEPHONE NUMBER (510) 223-0609		
07 OPERATOR (if known and different from owner) Photocircuits Atlanta, Inc.		08 STREET (Business, mailing, residential) 350 Dividend Drive			
09 CITY Peachtree City	10 STATE GA	11 ZIP CODE 30269	12 TELEPHONE NUMBER (404) 487-8888		

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 09 / 26 / 80 ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ / _____ / _____ ☐ C. NONE
MONTH DAY YEAR MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 05 / 17 / 89 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)	
CONTRACTOR NAME(S): _____			

02 SITE STATUS (Check one)

☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1980 Present ☐ UNKNOWN
BEGINNING YEAR ENDING YEAR

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Waste CuCl₂ solution (D002), spent rolled solder flux (D008)
Spent 1,1,1 trichlorethane (F001)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There have been no known releases of hazardous substances or wastes to the environment.

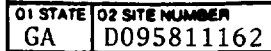
V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2: Waste Information and Part 3: Description of Hazardous Conditions and Incidents)

☐ A. HIGH (inspection required promptly) ☐ B. MEDIUM (inspection required) ☒ C. LOW (inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Wendell Quakenbush	02 OF (Agency, Organization) Photocircuits Atlanta	03 TELEPHONE NUMBER 404 487-8888
04 PERSON RESPONSIBLE FOR ASSESSMENT Tim Cash	05 AGENCY DNR- EPD	06 ORGANIZATION HWMP
07 TELEPHONE NUMBER (404) 656-7802		08 DATE 06 06 89 MONTH DAY YEAR

[illegible]

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D095811162

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: _____

(Acres)

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D095811162

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION (cite specific references e.g. state files, sample analysis reports)

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 159
RUN DATE: 01/09/86
RUN TIME: 10:01:20

M.2 - SITE MAINTENANCE FORM

		* ACTION: _	*
EPA ID : GAD095811162			
SITE NAME: PHOTOCIRCUITS ATLANTA INC	SOURCE: M	* _____	*
STREET : 350 DIVIDEND DR	CONG DIST: 06	* _____	*
CITY : PEACHTREE CITY	ZIP: 30269	* _____	*
CNTY NAME: FAYETTE	CNTY CODE : 113	* _____	*
LATITUDE : 21/51/42.0	LONGITUDE : 084/18/46.0	* _/_/_.	*
LL-SOURCE: G	LL-ACCURACY:	* _	*
SMSA : 0520	HYDRO UNIT: 03130005	* _____	*
INVENTORY IND: Y	REMEDIAL IND: Y	REMOVAL IND: N	FED FAC IND: N
NPL IND: N	NPL LISTING DATE:	NPL DELISTING DATE:	
SITE/SPILL IDS:		* _ _ _ _	*
RPM NAME: RAY WILKERSON	RPM PHONE: 404-347-2234	* _____	*
SITE CLASSIFICATION:		SITE APPROACH:	* _
DIOXIN TIER:	REG FLD1:	REG FLD2: 7	* _
RESP TERM: PENDING ()	NO FURTHER ACTION ()		* PENDING () NO FURTHER ACTION ()
ENF DISP: NO VIABLE RESP PARTY ()	VOLUNTARY RESPONSE ()		* _
ENFORCED RESPONSE ()	COST RECOVERY ()		* _
SITE DESCRIPTION:			
* _____			
* _____			
* _____			
* _____			

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 160
RUN DATE: 01/09/86
RUN TIME: 10:01:20

M.2 - ALIAS/ALIAS LOCATION MAINTENANCE FORM

SITE: PHOTOCIRCUITS ATLANTA INC

EPA ID: GAD095811162

ALIAS SEQ NO: 01

ALIAS NAME: TOPRI INC

SOURCE: R

* ACTION: _

ALIAS LOCATION

CONTIGUOUS PORTION OF SITE?

FED FAC IND:

STREET :

CONG DIST :

CITY :

ST: ZIP:

CNTY NAME:

CNTY CODE:

LATITUDE : / /

LONGITUDE : / /

LL-SOURCE:

LL-ACCURACY:

SMSA :

HYDRO UNIT:

* ACTION: _

ALIAS DESCRIPTION:

* _____ *

* _____ *

* _____ *

* _____ *

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 161
RUN DATE: 01/09/86
RUN TIME: 10:01:20

SITE: PHOTOCIRCUITS ATLANTA INC

EPA ID: GAD095811162 PROGRAM CODE: H01 PROGRAM TYPE:

PROGRAM QUALIFIER: ALIAS LINK :

PROGRAM NAME: SITE EVALUATION

DESCRIPTION:

* **ACTION:** _____

1

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 162
RUN DATE: 01/09/86
RUN TIME: 10:01:20

M.2 - EVENT MAINTENANCE FORM

* ACTION: _

SITE: PHOTOCIRCUITS ATLANTA INC
PROGRAM: SITE EVALUATION

EPA ID: GAD095811162 PROGRAM CODE: H01

EVENT TYPE: DS1

FMS CODE: EVENT QUALIFIER :

EVENT LEAD: E

EVENT NAME: DISCOVERY

STATUS:

DESCRIPTION:

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

ORIGINAL

CURRENT

ACTUAL

START:

START:

START:

* _/_/_ _/_/_ _/_/_ *

COMP :

COMP :

COMP : 08/01/80

* _/_/_ _/_/_ _/_/_ *

HQ COMMENT:

* _ _ _ _ _ *

RG COMMENT:

* _ _ _ _ _ *

COOP AGR #

AMENDMENT #

STATUS

STATE X

0

* _ _ _ _ _ *

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 163
RUN DATE: 01/09/86
RUN TIME: 10:01:20

M.2 - EVENT MAINTENANCE FORM

SITE: PHOTOCIRCUITS ATLANTA INC
PROGRAM: SITE EVALUATION

EPA ID: GAD095811162 PROGRAM CODE: H01

EVENT TYPE: PA1

FMS CODE: EVENT QUALIFIER :

EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT

STATUS:

DESCRIPTION:

* ACTION: _

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

ORIGINAL

CURRENT

ACTUAL

START:

START:

START: 12/27/85

* _/_/_ _/_/_ _/_/_ *

COMP :

COMP :

COMP : 12/30/85

* _/_/_ _/_/_ _/_/_ *

HQ COMMENT:

* _ _ _ _ _ *

* _ _ _ _ _ *

RG COMMENT:

COOP AGR #

AMENDMENT #

STATUS

STATE %

0

* _ _ _ _ _ *

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 164
RUN DATE: 01/09/86
RUN TIME: 10:01:20

M.2 - COMMENT MAINTENANCE FORM

SITE: PHOTOCIRCUITS ATLANTA INC

EPA ID: GAD095811162

COM
NO COMMENT

001 PART A- ON FILE

ACTION

*	-	_____	*
*		_____	*

**PRELIMINARY ASSESSMENT COVER SHEET
PHOTOCIRCUITS ATLANTA, INC.
GAD095811162**

I. HISTORY OF SITE

The Photocircuits Atlanta, Inc. facility is located at 350 Dividend Drive in Peachtree City, Georgia 30269. The Kollmorgen Corporation of Stamford, Connecticut has operated this facility since 1982. Photocircuits manufactures circuit boards for use in various electronics industries, in the production of Sylvania television sets, Chrysler automobile radios, home computer sets, etc. The blank circuit boards are constructed of fiberglass and coated with a thin layer of copper. Circuits are delineated with ink and excess copper is removed from the board with a cupric chloride-hydrochloric acid bath. The Part A Application for this facility has been withdrawn and it is presently classified as a generator.

II. NATURE OF HAZARDOUS MATERIALS

Sludge from the wastewater treatment system is removed and disposed of by Chem Waste Management of Emelle, Alabama; the cupric chloride waste solution is removed by Madison Industries of Woodbridge, New Jersey; the spent solvents (toluene and xylene) are re-used in plant processes and there is no waste resulting from its use; all empty 55 gallon drums are removed by J&B Smith Company of Atlanta, GA for the purpose of reconditioning; all non-hazardous solid waste is disposed of by Browning Ferris and scrap metal is removed for recycling by Southern Foundry. All wastes total an annual volume of 250 tons/year. Prior to 1982, the property was operated by Topri Incorporated and owned by Tokyo Print Industries. This company was also in the same line of business, except that they used electroplating processes. The waste streams were spent solvents and plating wastes which were disposed of by M&J Solvents and Chemical Waste Management of Alabama.

III. DESCRIPTION OF HAZARDOUS CONDITIONS, INCIDENTS, PERMIT VIOLATIONS

According to Mr. Samuel E. Roberts, Process Engineer for Photocircuits-Atlanta, Inc., Photocircuits has had no spills or on-site burial of hazardous wastes. All wastes are sent out for disposal or recycling.

IV. ROUTES OF CONTAMINATION

None

V. POSSIBLE AFFECTED POPULATION AND RESOURCES

None

VI. RECOMMENDATIONS AND JUSTIFICATIONS

Photocircuits Atlanta, Inc. has its own (totally enclosed) waste treatment plant that is permitted by rule under Section 266 of 40 CFR as adopted by reference by the Georgia Hazardous Waste Management Act. There is no storage longer than 90 days or disposal of wastes on site. However, since there is limited information pertaining to waste disposal practices of Topri Inc. (previous owners) this site is assessed a "Low" priority for a Site Inspection. ~~_____~~

VII. REFERENCES TO SUPPORTING DATA SOURCES

1. EPA 3510-1, 3510-3 (6/80) form, 9/13/82.
2. State of Illinois Special Hauling Manifest 11/25/81, 1/27/82, 1/28/82.
3. Notification of Hazardous Waste Activity 8/18/80 (Topri, Inc.).
4. Letter, 1/21/82, RE: Update of wastes on site at time of Topri's closed facility.
5. Cost Estimate for Closure, 1/21/82.
6. GA EPD Action Report, 4/14/82, 5/24/82.
7. M&J Solvents Hazardous Waste Manifests, 12/3/81.
8. Alabama Hazardous Waste Manifests: 1/26/82, 2/1/82, 4/5/82, 4/6/82, 4/7/82, 4/9/82, 4/12/82, 4/20/82 and 4/24/82.
9. Hazardous Waste Manifest, 8/18/82.
10. Letter, 10/12/82 RE: Waste disposal from Topri, Inc.
11. Waste System Description of Photocircuits, 10/15/82.
12. Generator Annual Hazardous Waste Reports 1982 & 1983.
13. Letter, 5/24/83, RE: Solder plating solution.
14. Waste Management Data Sheet, 2/3/84.
15. Trip Report, 3/23/84, 10/30/84.
16. Applied Biology Inc., RE: Sample analysis, 4/4/84.
17. Letter, 5/2/84, RE: Withdrawal of Part A Application for Photocircuits-Atlanta, Inc.
18. Letter, 5/24/84, RE: Acknowledgement of withdrawal and status change to Generator - GA EPD.

19. Generator Standards Inspection Checklist, 10/19/84.
20. Photocircuits-Contingency Plan.
21. Telephone Conversation Record, 10/22/85.

GAK/mcw005

File - Photocircuits-Atlanta, Inc. (B)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D095811162

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Photocircuits Atlanta, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 350 Dividend Drive			
03 CITY Peachtree City	04 STATE GA	05 ZIP CODE 30269	06 COUNTY Fayette	07 COUNTY CODE 113	08 CONG DIST 06
09 COORDINATES LATITUDE 21° 51' 42.0"E		LONGITUDE 084° 18' 46.0"W			
10 DIRECTIONS TO SITE (Starting from nearest public road) From intersection of GA Route 54 and Willow Road, proceed south on Willow Rd. for 1.0 mile. Turn left (southeast) onto Dividend Drive and continue for 100 ft. Facility is on the right (southwest).					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Kollmorgen Corporation		02 STREET (Business, mailing, residential) 66 Gate House Road			
03 CITY Stamford	04 STATE CT	05 ZIP CODE 06902	06 TELEPHONE NUMBER (203) 547-0600		
07 OPERATOR (if known and different from owner) Photocircuits Atlanta, Inc.		08 STREET (Business, mailing, residential) 350 Dividend Drive			
09 CITY Peachtree City	10 STATE GA	11 ZIP CODE 30269	12 TELEPHONE NUMBER (404) 487-8888		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: 9/13/82 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 10/19/84 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1982 BEGINNING YEAR present ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Non-hazardous wastewater treatment sludge. Cupric chloride. Wastes generated by previous tenant included spent solvents plating wastes.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Present operations pose no hazard; however, information on waste disposal practices of previous tenant is incomplete.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspection on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)			
---	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Margaret Zuga		02 OF (Agency/Organization) Photocircuits Atlanta, Inc.		03 TELEPHONE NUMBER (404) 487-8888	
04 PERSON RESPONSIBLE FOR ASSESSMENT Gilda A. Knowles		05 AGENCY DNR-EPD	06 ORGANIZATION RAU	07 TELEPHONE NUMBER (404) 656-7404	08 DATE 10/24/85 MONTH DAY YEAR

J. Suronic

[illegible]

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D095811162

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA D095811162

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff, standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: unknown

IV. COMMENTS

History of waste handling practices of previous tenant, Topri Print Industries, is incomplete.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)

GA EPD State File.
Photocircuits-Atlanta, Inc., Peachtree City, GA.
Telephone Conversation Record, 10/22/85.

ROAD CLASSIFICATION

Heavy-duty ——— Light-duty ———
 Medium-duty ——— Unimproved dirt ———
 ○ State Route

TYRONE, GA.
 N3322.5—W8430/7.5

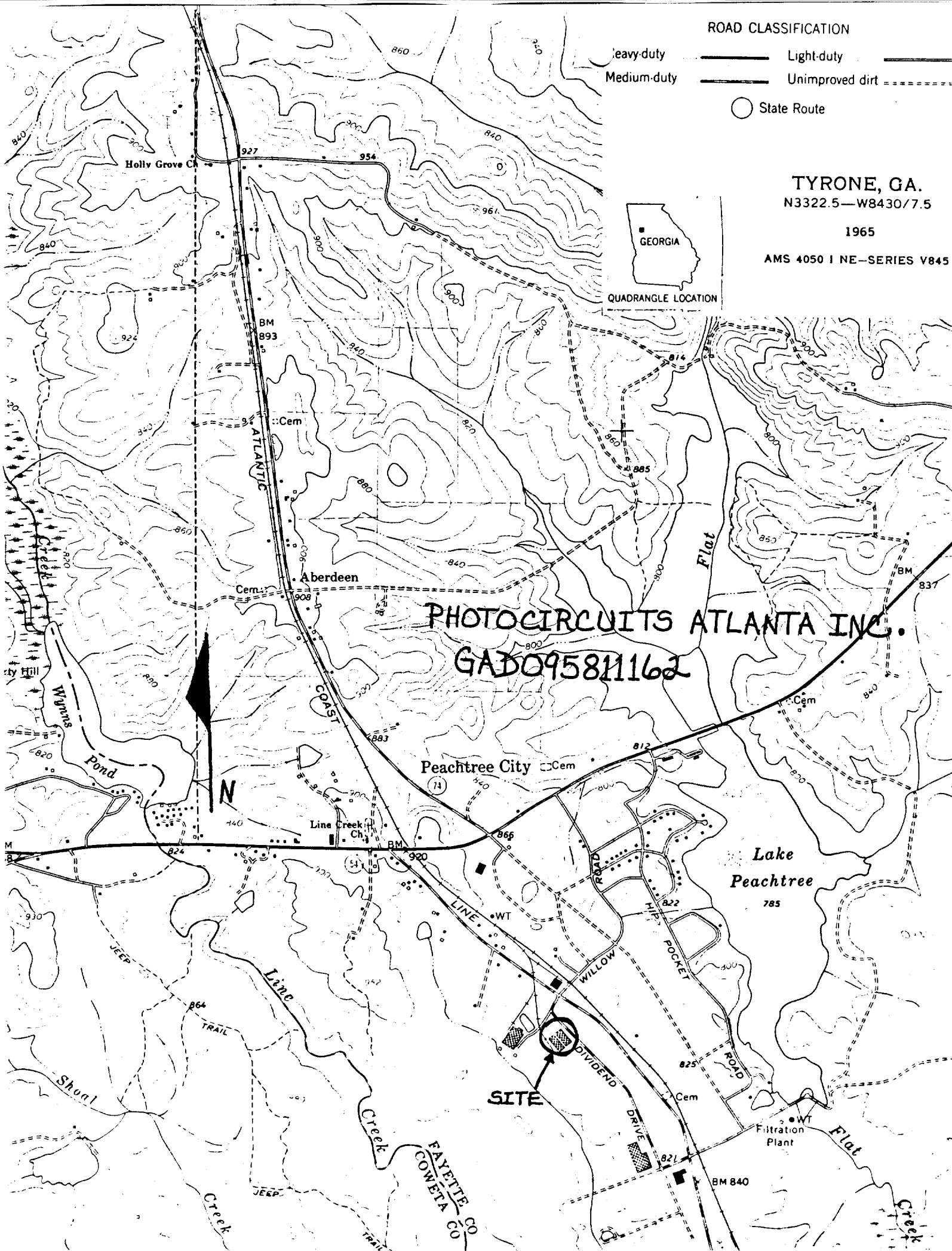
1965

AMS 4050 I NE—SERIES V845

GEORGIA

QUADRANGLE LOCATION

PHOTOCIRCUITS ATLANTA INC.
 GADO95811162



CONTINUE ON REVER

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	6	7	9	(specify) Printed Circuit Boards	7				(specify)									
C. THIRD										D. FOURTH									
7					(specify)	7				(specify)									

VIII. OPERATOR INFORMATION

A. NAME																				B. Is the name listed in Item VIII-A also the owner?	
PHOTOCIRCUITS - ATLANTA, INCORPORATED																				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)						
F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify)															A 404 487 8888						
E. STREET OR P.O. BOX																					
350 DIVIDEND DRIVE																					
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND							
PEACHTREE CITY										GA		30269		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO							

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
N										P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
U										G.A.D.0.9.5.8.1.1.1.6.2									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
R																			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Photocircuits manufactures printed circuit boards for industrial and consumer applications.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Chuck Marquardt		9/3/82

COMMENTS FOR OFFICIAL USE ONLY

--

FORM 3 RCRA		 HAZARDOUS WASTE PERMIT APPLICATION <small>Consolidated Permits Program (This information is required under Section 3005 of RCRA.)</small>		I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; display: inline-block;">F G A D 0 9 5 8 1 1 1 6 2</div>																																																																											
FOR OFFICIAL USE ONLY																																																																															
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)		COMMENTS																																																																											
<div style="border: 1px solid black; width: 100px; height: 20px;"></div>		<div style="border: 1px solid black; width: 100px; height: 20px;"></div>																																																																													
II. FIRST OR REVISED APPLICATION																																																																															
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																																																																															
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)																																																																															
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)			<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)																																																																												
<div style="border: 1px solid black; padding: 2px;">C 8</div> <div style="display: flex; justify-content: space-between;"><div>YR. MO. DAY</div><div>FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)</div></div>			<div style="display: flex; justify-content: space-between;"><div>YR. MO. DAY</div><div>FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN</div></div>																																																																												
B. REVISED APPLICATION (place an "X" below and complete Item I above)																																																																															
<input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS			<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT																																																																												
III. PROCESSES - CODES AND DESIGN CAPACITIES																																																																															
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).																																																																															
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.																																																																															
<div style="display: flex; justify-content: space-between;"><div style="width: 48%;"><p>1. AMOUNT - Enter the amount.</p><p>2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.</p></div><div style="width: 4%; text-align: center;">PROCESS CODE</div><div style="width: 48%;"><p>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</p><table border="0" style="width: 100%;"><tr><td style="width: 50%;">Storage: CONTAINER (barrel, drum, etc.) S01 GALLONS OR LITERS TANK S02 GALLONS OR LITERS WASTE PILE S03 CUBIC YARDS OR CUBIC METERS SURFACE IMPOUNDMENT S04 GALLONS OR LITERS Disposal: INJECTION WELL D79 GALLONS OR LITERS LANDFILL D80 ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION D81 ACRES OR HECTARES OCEAN DISPOSAL D82 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT D83 GALLONS OR LITERS</td><td style="width: 50%;">Treatment: TANK T01 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT T02 GALLONS PER DAY OR LITERS PER DAY INCINERATOR T03 TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.) T04 GALLONS PER DAY OR LITERS PER DAY</td></tr></table></div></div>						Storage: CONTAINER (barrel, drum, etc.) S01 GALLONS OR LITERS TANK S02 GALLONS OR LITERS WASTE PILE S03 CUBIC YARDS OR CUBIC METERS SURFACE IMPOUNDMENT S04 GALLONS OR LITERS Disposal: INJECTION WELL D79 GALLONS OR LITERS LANDFILL D80 ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION D81 ACRES OR HECTARES OCEAN DISPOSAL D82 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT D83 GALLONS OR LITERS	Treatment: TANK T01 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT T02 GALLONS PER DAY OR LITERS PER DAY INCINERATOR T03 TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.) T04 GALLONS PER DAY OR LITERS PER DAY																																																																								
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ACRES.....B	HECTARES.....Q																																																																														
EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																															
<div style="border: 1px solid black; padding: 5px;"><div style="display: flex; justify-content: space-between;"><div style="width: 30%;">C</div><div style="width: 30%;">D U P</div><div style="width: 30%;">T/A C</div><div style="width: 10%;">I</div></div><div style="display: flex; justify-content: space-between;"><div style="width: 30%;">1 2</div><div style="width: 30%;">13 14 15</div><div style="width: 30%;">16 17 18</div><div style="width: 10%;">19</div></div></div>																																																																															
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1	S 0 1	55ea.	G		7																																																																										
2	S 0 1	1.3ea.	Y		8																																																																										
3	S 0 2	11,500	G		9																																																																										
4					10																																																																										

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	
W	G	A	D	0	9	5	8	1	1	1	6	2	1	2	3	4	5	6	7	8	9	10	11	12	13	
													DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																			
							1. PROCESS CODES (enter)																			
	27	28	29	30			31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	
1	F	0	0	1	10,000	P	S	0	1	S	0	2	T	0	4	Distillation										
2	F	0	0	2	13	T	S	0	1	S	0	2	T	0	4	Distillation										
3	F	0	0	6	236	T	S	0	1																	
4	F	0	0	7	3000	G	S	0	1	T	0	1														
5	F	0	0	8	1000	G	S	0	1																	
6	F	0	0	9	1000	G	S	0	1	T	0	1														
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26																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
F	G	A	D	0	9	5	8	1	1	1	6	2							

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

7	0	1	8	4	6	W
---	---	---	---	---	---	---

LONGITUDE (degrees, minutes, & seconds)

0	2	1	5	1	4	2	E
---	---	---	---	---	---	---	---

VIII. FACILITY OWNER
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
E																			

2. PHONE NO. (area code & no.)

2	0	3	-	5	4	7	-	0	6	0	0
---	---	---	---	---	---	---	---	---	---	---	---

3. STREET OR P.O. BOX

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
F																			

4. CITY OR TOWN

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
G																			

5. ST.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
C																			

6. ZIP CODE

0	6	9	0	2
---	---	---	---	---

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

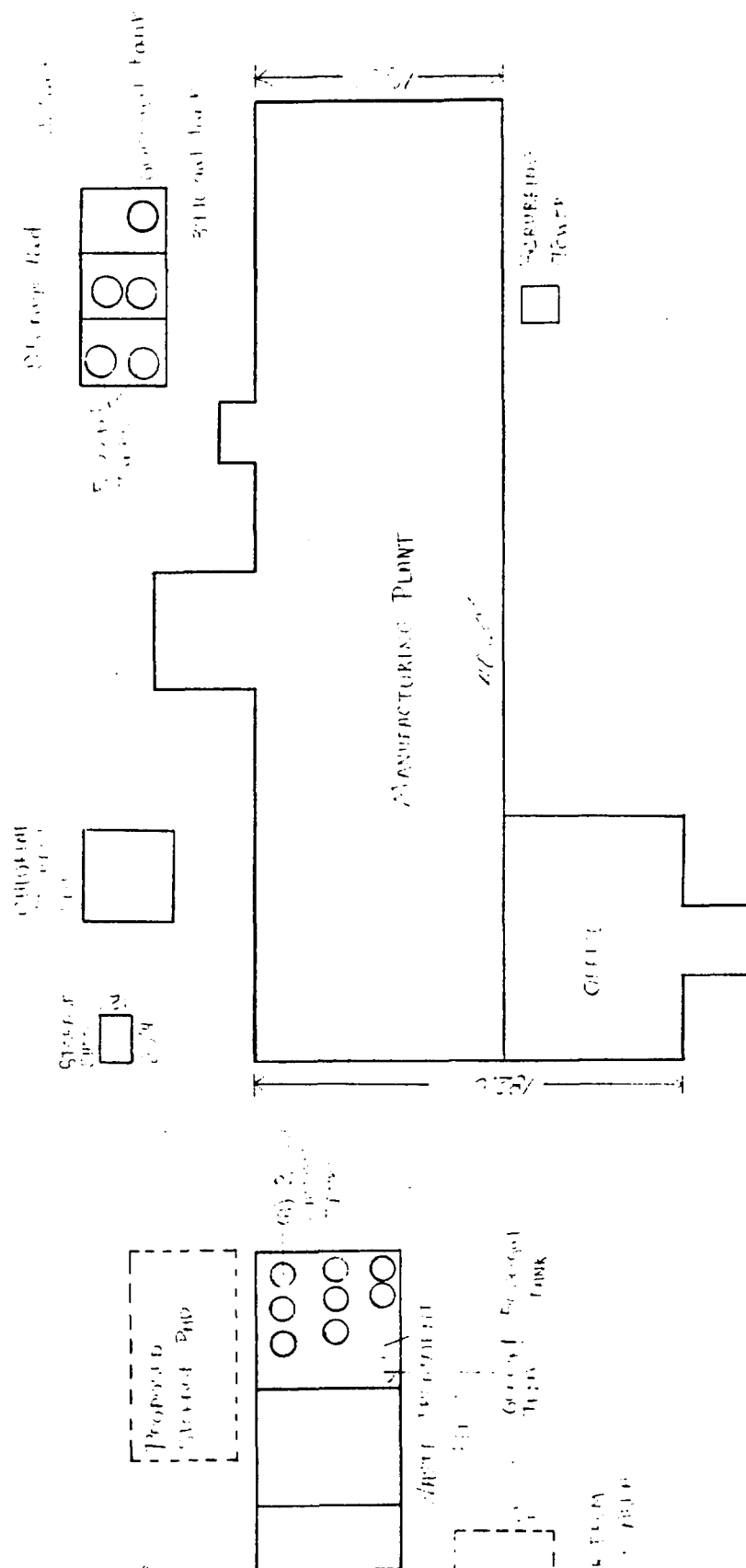
Chuck Marquardt

B. SIGNATURE

C. DATE SIGNED

9/13/82

V. FACILITY DRAWING (see page 4)



10

**TO BE COMPLETED BY
WASTE GENERATOR**

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

Authorization Number 992368 13

TOPRI, INC. 350 Dividend Drive 4044878888 913113002
(Company Name) Address Phone Number Generator Number
Peachtree City Georgia 30269 GAD095811162
City State Zip EPA Number

WASTE HAULER(S)

CP Inorganics Joliet, Ill. S W H Registration Number 0131-003
Hauler Name Hauler Address 25 31
815-727-1074 IDL062480850
Phone Number EPA Number
Hauler Name Hauler Address S W H Registration Number 32 38
Phone Number EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

CP Inorganics Industry Avenue 19702502
(Facility Name) Address 39 46
Joliet Illinois 60435 815-727-1074 IDL062480850
City State Zip Phone Number EPA Number
Alternate (Facility Name) Address 39 46
City State Zip Phone Number EPA Number

**TO BE COMPLETED BY
WASTE GENERATOR**

WASTE NAME Ammonical Copper Solution WASTE PHASE Liquid
(Liquid, Gaseous, Solid)
THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW
SHIPPING DESCRIPTION HAZARD CLASS
Ammonical Copper Solution NA 1760 D002
UN or NA Number EPA HW Number

WEIGHT FOR DOT USE 26,700 LBS WEIGHT FOR EPA USE MUST BE QUANTITY OF WASTE DELIVERED 3000 GALLONS (Circle One)
CONVERTED TO CU. YDS. OR GAL. 47 52 53
METHOD OF SHIPMENT (Circle One) (DRUMS Number) TANK TRUCK OPEN TRUCK OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND EPA
I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION [Signature] DATE 11-25-81
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS INDICATED
(1) John Hayward DATE 11/25/81
(Authorized Signature) 54 59
(2) _____ DATE _____
(Authorized Signature)

DISPOSAL STORAGE OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES _____ NO _____
I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE
[Signature] DATE 11/25/81
(Authorized Signature) 60 65

COMMENTS OR SPECIAL INSTRUCTIONS _____

IN ILLINOIS, 217-782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS, (800) 424-8800 or (202) 462-2671

DISTRICT OF COLUMBIA, PART 1 - GENERATOR PART 2 - EPA PART 3 - SITE PART 4 - HAULER PART 5 - EPA PART 6 - GENERATOR
RE: _____
GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

Authorization Number 992368

WASTE HAULER(S)

EPA Number

EPA Number

2

OUTSIDE ILLINOIS 800 / 424-8802 or 202 426-2675

DISTRIBUTION	PART 1 GENERATOR	PART 2 IEPA	PART 3 SITE	PART 4 HAULER	PART 5 IEPA	PART 6 GENERATOR
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REV # 1

GENERATOR COPY — PART 1 : DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED

ORDER NUMBER



000284

RECEIVED
PLEASE PLACE LABEL IN THIS SPACE

SEP 26 4 13 PM '66

ENFOLIO ENO

COMMENTS

[illegible]

INSTALLATION'S EPA I.D. NUMBER												APPROVED		DATE RECEIVED (yr, mo, & day)						
B	C	A	D	O	F	5	8	1	1	6	2	T/A	C			8	0	8	1	9
F																				
1	2									13	14	15	16	17		18	19	20	21	22

[illegible]

STREET OR P.O. BOX

[illegible]

CITY OR TOWN															ST.	ZIP CODE				
E															GA	3	0	2	6	9
4	p	e	a	c	h	t	r	e	e	C	i	t	y							

STREET OR ROUTE NUMBER

[illegible]

CITY OR TOWN															ST.	ZIP CODE					
6	P	e	a	c	h	t	r	e	e	C	i	t	y		G	A	3	0	2	6	9

NAME AND TITLE (last, first, & job title)

[illegible]

A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F - FEDERAL	M
M - NON-FEDERAL	

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

A. GENERATION

☐ B. TRANSPORTATION (complete item VII) **C. TREAT/STORE/DISPOSE**

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ **A. AIR** ☐ **B. RAIL** ☐ **C. HIGHWAY** ☐ **D. WATER** ☐ **E. OTHER (specify):**

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ **A. FIRST NOTIFICATION** ☐ **B. SUBSEQUENT NOTIFICATION** (complete item C)

C. INSTALLATION'S EPA I.D. NO.							

DESCRIPTION OF HAZARDOUS WASTES

the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY

WAD09581116231

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26 7 23 - 26	2 F 0 0 2 23 - 26 8 23 - 26	3 F 0 0 6 23 - 26 9 23 - 26	4 F 0 0 7 23 - 26 10 23 - 26	5 F 0 0 8 23 - 26 11 23 - 26	6 F 0 0 9 23 - 26 12 23 - 26
---	---	---	--	--	--

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26 19 23 - 26 25 23 - 26	14 23 - 26 20 23 - 26 26 23 - 26	15 23 - 26 21 23 - 26 27 23 - 26	16 23 - 26 22 23 - 26 28 23 - 26	17 23 - 26 23 23 - 26 29 23 - 26	18 23 - 26 24 23 - 26 30 23 - 26
---	---	---	---	---	---

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26 37 23 - 26 43 23 - 26	32 23 - 26 38 23 - 26 44 23 - 26	33 23 - 26 39 23 - 26 45 23 - 26	34 23 - 26 40 23 - 26 46 23 - 26	35 23 - 26 41 23 - 26 47 23 - 26	36 23 - 26 42 23 - 26 48 23 - 26
---	---	---	---	---	---

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

Vice President & General Manager

DATE SIGNED

8/18/80



TOPRI INCORPORATED

350 DIVIDEND DR. PEACHTREE CITY, GEORGIA 30269 PHONE (404) 487-8888

RECEIVED

JAN 21 1982

ENVIRONMENTAL PROTECTION DIVISION
JAN 11 1982
LAND PROTECTION BRANCH

SIC 3679
CURRENT RECORDS

Environmental Protection Division
270 Washington St. S.W.
Atlanta, Georgia

Due to adverse business conditions, we at Topri, Inc., have found it necessary to cease operations at our facility an 350 Dividend Drive, Peachtree City, Georgia. We continue to exist with a skeleton staff, whose responsibility it is to meet closure and to assist in a sale of the facility.

Due to the nature of the marketplace it is impossible to provide an exact date as to when there will be a change in ownership of the facility. It is also impossible to set exact dates for waste disposal since contracts have to be secured and transportation must be secured. Dates forecast in this letter should be relatively accurate.

At the time that the said facility ceased production, the following wastes were on site.

1. Continue Etch 9110 (Ammoniacal Alkaline Etchant)
Vendor: MacDermid, Inc.
Quantity: 5575 gallons
Disposal Means: Return to C.P. Inorganics for recycling.
2. Methylene Chloride
Vendor: Ashland Chemical
Quantity: 4440 gallons spent and 1518 gallons fresh
Disposal Means: Return spent to M & J Solvents for recovery and return fresh to Ashland Chemical.
3. 1,1,1 Trichloroethane
Vendor: Al Chem
Quantity: 550 gallons
Disposal Means: Return to M & J Solvents for recovery.
4. Copper Sulfate Solution
Vendor: Photo Chemical Systems
Quantity: 7295 gallons
Disposal Means: Ship to Chemical Waste Management, Emile Alabama for disposal.
5. Tin-Lead Plating Solution
Vendor: Photo Chemical Systems (Harstan)
Quantity: 2310 gallons
Disposal Means: Ship to Chemical Waste Management



TOPRI INCORPORATED

350 DIVIDEND DR. PEACHTREE CITY, GEORGIA 30269 PHONE(404)487-8888

6. Catalyst (Tin-Palladium)
Vendor: Shipley Company
Quantity: 605 gallons
Disposal Means: Batch treat in our waste water treatment system
7. Nitric Acid (Used to strip copper)
Vendor: Photo Chemical Systems
Quantity: 1845 gallons
Disposal Means: Treat on site through our waste water treatment site, by precipitation of copper and pH adjust.
8. Cupric Chloride
Quantity: 2300 gallons
Disposal Means: To C.P. Chemicals (Sumter, S.C.) for recycling.
9. Copper Sulfate Pentahydrate Crystals
Quantity: 6-55gallon drums
Disposal Means: Sell to C.P. Chemicals (Wayne Burgess)
10. Copper Oxides from Cupric Chloride Regeneration
Quantity: 12-55gallon drums
Disposal Means: Sell to C.P. Chemicals (Wayne Burgess)
11. Gold Plating Solution
Vendor: Technic Inc.
Quantity: 22 gallons
Disposal Means: To Technic Inc. for reclamation of gold
12. Waste Water Treatment Sludge
Quantity: 40,000 gallons
Disposal Means: 1.) Ship to CWM for disposal
2.) Solidify using Solid Tek process (They are currently doing feasibility tests for submittal to the EPD)
13. Tin-Lead Anodes
Quantity: 300 lbs.
Disposal Means: Sell to Alpha Metals
14. Still Bottom from Recovery of Methylene Chloride
Quantity: 1100 gallons (approx)

Any remaining virgin chemicals will be or have been returned to the manufacturer or supplier.

COST ESTIMATE FOR CLOSURE

WASTE	COST ESTIMATE
1. Continue Etch 9110	\$1514.16 freight
2. Methylene Chloride	No Charge
3. 1,1,1 Trichloroethane	No Charge
4. Copper Sulfate Solution	\$3400.00
5. Tin-Lead Plating Solution	\$1383.25
6. Catalyst	\$30.00
7. Nitric Acid	\$600.00
8. Cupric Chloride	No Charge
9. Copper Sulfate Pentahydrate Crystals	No Charge
10. Copper Oxides	No Charge
11. Gold Plating Solution	No Charge
12. Waste Water Sludge	\$16,400.00
13. Tin-Lead Anodes	No Charge
14. Methylene Chloride Still Bottom	\$1875.00
	<hr/>
TOTAL COST	\$25,202.41
Wastes Still On Site (1-11-82)	Target Date for Removal
1. Methylene Chloride (Fresh)	1-15-82
2. Copper Sulfate Solution	1-29-82
3. SnPb Plating Solution	Awaiting contract approval
4. Copper Sulfate Crystals	1-22-82

**TOPRI INCORPORATED**

350 DIVIDEND DR. PEACHTREE CITY, GEORGIA 30269 PHONE (404) 487-8888

Wastes Still On Site (1-11-82)

5. Copper Oxides
6. Waste Water Sludge

Target Date for Removal

1-22-82
Awaiting Solid Tek Results

Wastes Already Disposed Of:

1. Continue Etch 9110
2. Methylene Chloride (spent)
3. 1,1,1 Trichloroethane
4. Catalyst
5. Nitric Acid
6. Cupric Chloride
7. Gold Plating Solution
8. SnPb Anodes

Disposal Date

11-25-81
12-3-81
12-3-81
12-29-81
12-1-81
1-5-82
Dec. 1981
12-3-81

The above is a summary of clean up requirements and costs. As stated, removal dates are only targets and may occur at an earlier or a later date. If any major changes are required we will contact you as needed. We will continue to contact you as to our progress. As more information becomes available to us, we will certainly relay it to you.

Respectfully submitted,



Teji Arai
Executive Vice President
Topri Incorporated

ENVIRONMENTAL PROTECTION DIVISION
INDUSTRIAL AND HAZARDOUS WASTE MANAGEMENT PROGRAM

ACTION REPORT

Yellow
Red
Green

REVIEWED BY: <u>LB</u>	SEQUENCE NUMBER IS: 01191
LP FILE ENTRY: - Yes	RECORDED BY: BPK 4-14-82

FACILITY NAME: TOPRI INCORPORATED	SIC CODE: 3679
LOCATION STREET: 350 DIVIDEND DRIVE	PHONE NUMBER: 404/487-8888
CITY: PEACHTREE CITY	ZIP: 30269 COUNTY: FAYETTE
FACILITY ID NO: GAD095811162	PERMIT NUMBER OR STATUS: PS01
ACTIVITY CODE: A02	MAJOR (M) OR N-MAJOR(N): N COMPLIANCE OFFICER: BURNS

ACTION BY: Betty Burns	ACCOMPANIED BY: Verona Barnes
PERSON(S) CONTACTED: Rick Duvall	TITLE(S): Qual. Ass. Engineer

DATE OF ACTION: 811207	FOLLOW UP DATE: 820108
PROGRAM ACTIVITY: 02 Inspection & Enforcement	FIELD HOURS: 04 TOTAL HOURS: 04
ACTION TAKEN: 11 Conduct Complaint Inspection	
FINDING/DECISION: 83 Facility in Violation of Rules, Regs, Permit	
NEXT ACTION: 73 Request Additional Info <u>74 - 1,1,1 trichloroethane</u>	

COMMENTS, CONCLUSIONS, AND RECOMMENDATIONS

COMMENTS:

1. This investigative inspection was conducted because of complaint # 1-67 which expressed concern by Fayette citizens that Topri was rumored to be closing soon and would be leaving behind on plant site unwarranted and/or hazardous wastes.

2. I visited the facility, accompanied by Verona Barnes, and discussed plant closing status with Rick Duvall, Quality Assurance Engineer. He confirmed that Topri, with print and etch units still operational, would be totally closed down in a month or two. Furthermore, he provided the following information on the company's waste materials.

cc:

- a. methylene chloride (3000 gallons) has been sent to M & J Solvents, Atlanta, GA.
- b. 1,1,1 trichloroethane (500 gallons) has been sent to M & J Solvents. Manifest #2424 for waste listed under (a) & (b).

- c. Plating waste #F006 (40,000 gallons on site) to be transported by Barton Pumping Co. and disposed of at Chemical Waste Management of Alabama.
- d. Copper Sulfate (72,000 gallons on site - including 4,000 contained in drums and 3,200 in plating tanks) to be disposed of at Chemical Waste Management of Alabama.
- e. Tin lead plating solutions (2,000 gallons) to be disposed of at Alabama hazardous waste site.
- f. Catalyst (contains stannous and palladium) 605 gal. - this will be treated and reduced down to 100 gallons of sludge and disposed of at Alabama hazardous waste site.
- g. Nitric acid stripper will be treated through Topri's wastewater treatment system (heavy metals precipitated and neutralized) with effluent discharged to sanitary sewer.
- h. Continue etch #9110, an amonical solution manufactured by McDermitt Product (5,000 gallons of which 3,000 gallons have been shipped to CP Inorganics Company, Juliette, Illinois, balance of solution remains in holding storage tank for late shipment to CP Inorganics.
- i. Cupric Chloride, currently in manufacturing system and in an approximately 10 days will also be sent to CP Inorganics Co (ph# 919/781-6226).
- j. Copper Sulfate crystal (6 - 55 gallon drums) will be sent to CP Chemical (contact by Wayne Burgess).
- k. Gold plating bath (15 gallons now in plating tank) and (15 gallons of nickel plating bath) - this will be sent to Technique Inc., Raleigh, NC (contact is Matt Cox).
- l. Tin lead anodes (297.5 lbs.) and Copper anodes (2958 lbs.) will be sent to Alpha Metals Company or will be otherwise recycled.
- m. Approximately 700 empty drums (some in back plant property) will be accumulated, they will be shipped to Ashland Chemical Company.

CONCLUSIONS:

- 1. I informed Mr. Duvall that TSD closure plan requirement violations under 40 CFR, Subpart G, Section 265, is applicable as we were not notified by the facility of proposed closure status. Mr. Duvall stated that he was presently in process of gathering data and making necessary arrangements for preparing closure plans and closure estimates for complying with the aforesated requirements.

RECOMMENDATIONS:

- 1. Facility must submit closure plans by January 15, 1982.

ENVIRONMENTAL PROTECTION DIVISION
INDUSTRIAL AND HAZARDOUS WASTE MANAGEMENT PROGRAM

ACTION REPORT

Yellow
Red
Green

REVIEWED BY:	SEQUENCE NUMBER IS: 01191
LP FILE ENTRY: Yes	RECORDED BY: BPK 5-24-82

FACILITY NAME: TOPRI INCORPORATED	SIC CODE: 3679
LOCATION STREET: 350 DIVIDEND DRIVE	PHONE NUMBER:
CITY: PEACHTREE CITY	ZIP: 30269 COUNTY: FAYETTE
FACILITY ID NO: GAD095811162	PERMIT NUMBER OR STATUS:
ACTIVITY CODE: A02	MAJOR (M) OR N-MAJOR(N): COMPLIANCE OFFICER:

ACTION BY: Betty Burns <i>BB</i>	ACCOMPANIED BY:
PERSON(S) CONTACTED: Rice Duvall	TITLE(S): Q. A. Engineer

DATE OF ACTION: 820210	FOLLOW UP DATE: 820430
PROGRAM ACTIVITY: 02 Inspection & Enforcement	FIELD HOURS: 04 TOTAL HOURS: 04
ACTION TAKEN: 13 Conduct Routine Inspection	
FINDING/DECISION: 95 Additional Info or Action Required	
NEXT ACTION: 36 Request Submission of Permit Application	

COMMENTS, CONCLUSIONS, AND RECOMMENDATIONS

COMMENTS:

Per inspection, observed remaining waste to be mostly plating waste in pits, tanks, underneath tanks; approximately 15 to 20 types of raw material (small containers) and about 100 empty containers (plastic and metal). Further waste and/or material management plans include disposal of sludges at Alabama and/or treatment by Solid Tek, raw material to remain with new facility and drums to be sold to vendors. Facility provided copies of manifest shipment documents on most of the wastes that have been removed from site. Mr. Duvall notes plant is being purchased by Photo Circuit of Long Island, New York. New plant will assume same liability.

cc: CONCLUSIONS: Facility must complete new notification packet and permit Part A application in accordance with new name and/or ownership.
RECOMMENDATIONS: By letter on April 30 1982 supply facility with new hazardous waste activity packet and request submittal of completed forms.

ENVIRONMENTAL PROTECTION DIVISION
INDUSTRIAL AND HAZARDOUS WASTE MANAGEMENT PROGRAM

ACTION REPORT

Yellow
Red
Green

REVIEWED BY:	01191
LP FILE ENTRY: Yes	SEQUENCE NUMBER IS: BPK 5-24-82
	RECORDED BY:

FACILITY NAME: TOPRI INCORPORATED	SIC3679
LOCATION STREET: 350 DIVIDEND DRIVE	CODE:
CITY: PEACHTREE CITY	PHONE NUMBER: 30269 FAYETTE
FACILITY ID NO: GAD095811162	ZIP: COUNTY:
ACTIVITY CODE: A02	PERMIT NUMBER OR STATUS: MAJOR (M) OR N-MAJOR(N): COMPLIANCE OFFICER:

ACTION BY: Betty Burns <i>AB</i>	ACCOMPANIED BY:
PERSON(S) CONTACTED: Rick Duvall	Qual. Assur. Eng.
	TITLE(S):

DATE OF ACTION: 820122	FOLLOW UP DATE: 820210
PROGRAM ACTIVITY: 02 Inspection & Enforcement	FIELD HOURS: 02 TOTAL HOURS: 02
ACTION TAKEN: 35 Review & Provide Comment	
FINDING/DECISION: 86 Facility has Ceased Violation of Rules, Regs, or Permit	
NEXT ACTION: 13 Conduct Routine Inspection	

COMMENTS, CONCLUSIONS, AND RECOMMENDATIONS

COMMENTS:

On January 21, 1982, this office received Topri's letter of January 11, 1982 containing a summary "closure plan" of the facility's cleanup requirements and cost estimates. Specially, their summary lists 14 wastes by name, quantity and proposed disposal destination. Additionally, cost estimates are provided for handling each waste with waste list noting those wastes already removed from site (removal dates noted) and remaining waste (proposed removal date noted).

CONCLUSIONS: Facility has provided satisfactory closure plan addressing TSD requirements per 391-3-11-.10/40 CFR, Subpart G, §265.110, General Applicability; 265.112, Closure Plan. The next closure requirements which the facility must comply with include 40 CFR §§265.114 and 265.115 - disposal or decontamination of plant equipment and certification of proper closure.

RECOMMENDATIONS: Conduct routine inspection to monitor or follow-up facility's final closure activities by February 10, 1982.

cc:



Subsidiary of Kollmorgen Corporation

October 12, 1982

Mr. Howard L. Barefoot
Unit Coordinator
Industrial & Hazardous Waste
Management Program

Dear Mr. Barefoot:

In response to your recent request for a status report regarding closure of the old Topri facility, I submit the following information. The Topri facility did not undergo closure prior to Topri's sale of stock to Kollmorgen Corporation. Topri management carried out disposal of all waste and virgin material with the exception of the sludge that was generated from the waste treatment operation. Disposal of the sludge (F006) was carried out by Photocircuits management, following acquisition of Topri stock.

Listed below are wastes, which were included in the letter generated by Topri on January 11, 1982, and their disposal means and dates.

<u>WASTE MATERIAL</u>	<u>DISPOSAL/RECLAMATION</u>	<u>DATE</u>	<u>MANIFEST</u>
Continue Etch 9110	C.P. Inorganics	11-25-81	0463997
	C.P. Inorganics	1-27-82	0539315
Methylene Chloride (Fresh)	Ashland Chemicals	1-27-82	-----
(Spent)	M & J Solvents	12-03-81	2424
1,1,1 Trichloroethane	M & J Solvents	12-03-81	2424
Copper Sulfate Solution	Chem. Waste Mgt.	1-26-82	37107
		2-01-82	41304
Solder Plating Solution	On site until end of construction		
Catalyst	Treated in waste treatment on 1-4-82		
Nitric Acid	Treated on site.		
Cupric Chloride Solution	C.P. Chemicals	1-05-82	Freight Bill 81836
Copper Sulfate Pentahydrate	C.P. Chemicals	2-04-82	
Copper Hydroxide	C.P. Chemicals	2-04-82	

Atlanta Photocircuits Inc

Subsidiary of Kollmorgen Corporation

<u>WASTE MATERIAL</u>	<u>DISPOSAL/RECLAMATION</u>	<u>DATE</u>	<u>MANIFEST</u>
Sludge (F006)	Chem. Waste Management	4-05-82	41308 ✓
		4-05-82	41309 ✓
		4-06-82	41310 ✓
		4-06-82	41311 ✓
		4-07-82	41312 ✓
		4-07-82	41313 ✓
		4-08-82	41314 ✓
		4-08-82	46027 ✓
		4-09-82	46028 ✓
		4-12-82	46029 ✓
		4-19-82	46030 ✓
		4-23-82	42204 ✓
SnPb Anodes	Sold		
Gold Solution	Technic Inc. (recovered)		
Methylene Chloride			
Still Bottoms	Chem Am for recovery		

Please find enclosed all supporting paperwork and copies of shipping manifests. Should further questions arise, please do not hesitate to call me regarding the issue.

We greatly appreciate your cooperation in all matters concerning the permitting of our facility and look forward to working with you in the future.

Sincerely,
Rick DuVall
Rick DuVall
Technical Support Supervisor

C. P. [unclear]
5/18/82 S.C.

Photocircuits Atlanta Inc.

Subsidiary of Kollmorgen Corporation

October 15, 1982

OCT 21 1982

ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

Ms. Betty J. Burns
Environmental Specialist
Industrial and Hazardous Waste
Management Program
Land Protection Branch

Dear Ms. Burns:

As we at Photocircuits-Atlanta approach start up date for our renovated waste treatment system, I find it beneficial to recap the events of the past six months, which led to our current status.

On April 7, 1982, following acquisition of Topri's stock, we submitted a revised Hazardous Waste activity notification to Mr. James Scarbrough at Region IV of the EPA. On this notification, we denoted the change of ownership to Kollmorgen Corporation.

On May 25, 1982, Michele Principe and I met with Mr. John Taylor of the Environmental Protection Department. At that time, we informed the department of our intentions to substitute plate and frame filtration for ultrafiltration while still achieving required discharge limits. Mr. Taylor saw no problem with the substitution.

In a letter generated September 16, 1982, and in response to our August 6, 1982 meeting, Mr. Howard Barefoot made the following requests. One, that a revised Part A be submitted, a Part B checklist be completed, financial responsibility data be submitted and that a notification form be submitted. As a final request, Mr. Barefoot requested a report of Topri's closure status. In addition, Mr. Barefoot expressed the departments acceptance of our substitution of plate and frame filters with diatomaceous earth precoat for the ultra filtration unit.

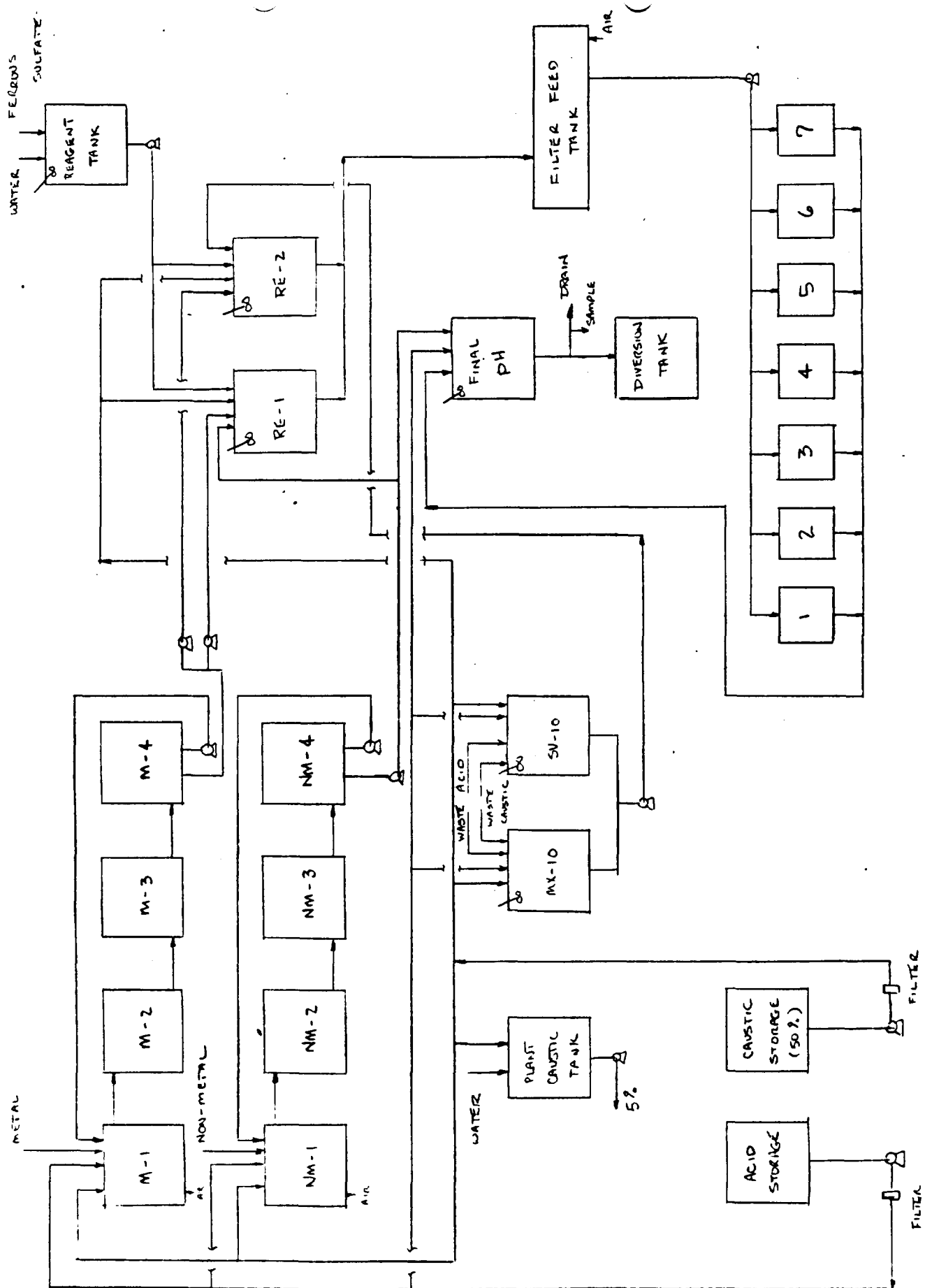
The Part A has been submitted by registered mail and all additional materials will follow within the prescribed time frames. Also find enclosed the requested production flow charts and the waste treatment system flow chart.

Thank you for your help over the past six months. We shall look forward to future dealings.

Sincerely,

Rick D. Vall

Rick DuVall
Technical Support Supervisor



SYSTEM DESCRIPTION

A. COLLECTION AND TRANSFER - (Improved Tanks and Control)

All wastes will flow, by gravity, to separate sumps, located in an outdoor lift station. Waste streams are segregated as metal bearing and non-metal bearing. Each sump is provided with two 80 GPM centrifugal pumps for transfer of wastes to the equalization and surge tanks.

The surge and equalization system consists of eight 12,000 gallon Owens-Corning Fiberglass tanks. Four tanks are designated metal bearing and four non-metal bearing. All tanks are housed in an enclosed 55,000 gallon capacity floor sump. The equalization tank in each system is equipped with PH control. These tanks are also equipped with air spargers for thorough mixing. Initial PH is adjusted to 8.0 for non-bearing metal waste, and 6.0 for metal bearing waste. Upon filling of each equalization tank, overflow begins into the manifolded surge tanks. The final surge tank in each line is provided with two staged 60 GPM centrifugal pumps for transfer of wastes into the treatment area, and one 120 GPM pump to recirculate water back to the equalization tank. This recirculation enhances mixing and keeps the surge tanks as empty as possible.

B. ONE STAGE REACTION - (Same as original installation)

Metal bearing wastes are transferred from the Equalization and Surge System to either or both of two reaction tanks. In the reaction tank PH is adjusted to 10.5 with Sodium Hydroxide and a "Reagent," FeSO_4 , is added in a ratio of 3:1, iron to heavy metals. In the alkaline PH range, heavy metals will precipitate as oxides and hydroxides. With the addition of the "Reagent," these solids will form an agglomerated sludge.

The PH of the reaction process is continuously measured by means of an immersion type sensor. The signal produced by the PH sensor is transmitted to the PH recording controller and is continuously recorded on a 24 hour circular chart.

From these reaction tanks, the agglomerated liquid will flow into a 6000 gallon filter feed tank.

C. FILTRATION - (Change in method of filtration)

Filtration in the past involved an ultrafiltration unit. The water was circulated through the ultrafiltration unit at a high volume low pressure. Water passed through the membrane tubules and ran into a collection pan where it was channeled to the final PH adjust tank. Solids remained within the system and were periodically drawn off and dewatered by means of centrifuge.

The proposed system will take the water from the filter feed tank and filter it through a bank of seven plate and frame filters whose polypropylene filter cloth has been precoated with diatomaceous earth. This provides for filtration and dewatering in a single step.

Test have been performed, using this sytem, to assess water quality, flow rate and quality of the filter cake. Tests were performed as follows:

1. Representative Rinse Water Sample
 - Cu -----100 mg/l
 - Ni ----- 40 mg/l
 - Sn-Pb ----- 10 mg/l
2. pH Adjust to 10.5
3. FeSO_4 addition (3:1 Fe to heavy metals)
4. Precoat filter
5. Run filter press and sample effluent
6. A.A. Spectrophotometer Results
 - Pb
 - 1. Non-detectable
 - 2. Non-detectable
 - 3. Non-detectable
 - 4. Non-detectable
 - Ni
 - 1.X=0.5ppm
 - 2.X=0.5ppm
 - 3.X=0.5ppm
 - 4.X=0.4ppm
 - Cu
 - 1.X=0.4ppm
 - 2.X=0.5ppm
 - 3.Non-detectable
 - 4.X=0.3ppm

Water clarity is exellent. Loading tests indicate an average flow rate of 20GPM/press. The system with seven filter presses has been sized to meet the maximum of 120 GPM metal bearing waste stream from the maufacturing plant.

C. FINAL pH ADJUSTMENT - (Same as original installation)

Filtrate from the plate and frame filter passes into the final pH tank for pH adjustment before being discharged to the sewer. A submersion sensor monitors pH and it is recorded on a 24 hour circular recorder, pH will be adjusted to 8.0. As a pH monitor back up, a pH meter and diverting value will be placed at the feed to the sewer. The meter will have a high-low set range. Should the pH fall below 6.0 or rise above 9.0 the valve will automatically divert flow to a 6000 gallon holding tank. This will allow the operator to make all necessary adjustments.

All concentrated baths will be piped into one of two bath treatment tanks. These operations will require manual pH adjust and chemical additions for precipitation of metal. Material will then be filtered on a separate filter press and the filtrate will be bled into the primary treatment system.

Water from the non-metal bearing system is transferred directly from the equalization and surge tanks to the final pH tank for pH adjustment prior to sewer discharge.

E. SLUDGE AND SLUDGE DISPOSAL - (as solids, not slurry)

Sludge produced by this system will contain 40-50% solids. Sludge will be packed in drums or, pending approval by Chemical Waste Management, Marino Systems Jumbo Sack. The sludge will be stored behind the waste treatment building in a RCRA storage area. The storage area will contain a sump and pump to collect any rainwater or leakage and this will be transferred into the waste treatment building for treatment. All sludge will be disposed of at the Chemical Waste Management site in Emelle, Alabama.

F. PROVISIONS FOR MALFUNCTION OF THE SYSTEM

If the waste effluent should run out of spec or there is a malfunction mechanically we have three options. First, water through the discharge system is automatically stopped and filtrate flow is diverted to a 6000 gallon diversion tank. Secondly, we then rely on our system's 70,000 gallon surge capacity to allow time for correction to the system. This surge capacity will hold us for 4-5 hours. If at the time the surge tanks are full, we have not corrected the problem, the water main to the plant will be closed and the plant will shut down until all corrections are made.

Effluent from the system will be monitored for pH as described above and by means of an in-line turbidimeter. The system will alternate sampling of effluent from the on line filter presses and alert operators to any problem of solid bleed through. Also, effluent will be sampled automatically at preset intervals for analysis by atomic absorption.

The waste treatment building itself has new floor drains and a central collection sump to collect spills. This sump is provided with an automatic pump down feature to introduce the spills back into the system. Berms will be built in front of all doors to prevent any spillage out of the building.

In an effort to simplify the waste treatment process, we have chosen to eliminate the use of chelating agents within the plant. This has already been accomplished on the print and etch line and can be accomplished in the future on the plated through line when it goes into operation. The primary sources of chelating agents here would be in the copper reduction bath and the ammonia from the etcher. Our new reduction process employs no chelating agents and we intend to utilize a peroxide-sulfuric etch system, thereby eliminating ammonia.

ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1982

AFFIX LABEL HERE

GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form was enclosed, affix it in the space provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If the information is correct and complete, leave sections I, II, and III below blank. If you did not receive a preprinted label, complete all sections. REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM. The information requested in this report is required by law, Section 3002 of the Resource Conservation Recovery Act.

JAN 26 1983

ENVIRONMENTAL PROTECTION DIVISION
Hazardous Waste Protection Branch

I. GENERATOR'S EPA I.D. NUMBER

GA D 0 9 5 8 1 1 1 6 2

II. NAME OF INSTALLATION

PHOTO CIRCUITS ATLANTA INC

III. INSTALLATION MAILING ADDRESS

3501 DIVIDEN DR

Street or P.O. Box

PEACHTREE CITY GA 30121

City or Town

State Zip Code

IV. LOCATION OF INSTALLATION (if different than section III above)

15 16 45

Street or Route number

15 16 41 42 47 51

City or Town

State Zip Code

V. INSTALLATION CONTACT

DIIVIALE TRICKI

Name (last and first)

404 487 8888

Phone No. (area code & no.)

SIC CODE 3 6 7 9

VI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles R. Marquardt Vice Pres.

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

1/24/83

1982 FORMS

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1982

Date rec'd:

Rec'd by:

VII. GENERATOR'S EPA I.D. NO.

T/A C

G A D 0 9 5 8 1 1 1 6 2 3 3 3

1 2

13 14 15

IX. FACILITY'S EPA I.D. NO.

A L D 1010101612121416141

16

28

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL WASTE MANAGEMENT

X. FACILITY ADDRESS

P.O. BOX 55/HWY 17 MILE MARKER
EMELLE, ALABAMA 35459

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1982. This section to be completed only once. Do not repeat on supplemental sheets.)

CHEMICAL WASTE MANAGEMENT ALD000622464
CP. INORGANICS IDL062480850

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Spent plating bath solution from electroplating operation	02	F 0 0 7	17 12 17 12 12	P
2	2	Liquid Copper Sulfate	33 34 43	46 47 50 51	59 60	
3	3	Wastewater treatment Sludge from electroplating	1 5	F 0 0 6	12 13 15	T
4	4					
5	5					
6	6					
7	7					
8	8					
9	9					
10	10					
11	11					
12	12					

XIII. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1982

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

GG A D 0 9 5 8 1 1 1 1 6 2 ~~ENV~~

1 2 13 14 15

T/A C

IX. FACILITY'S EPA I.D. NO.

F S C D 0 7 0 3 7 1 8 8 5

16 28

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

C. P. CHEMICALS

X. FACILITY ADDRESS

HWY 15 SOUTH, P. O. BOX 1959
SUMTER, S. C. 29150

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during 1982. This section to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Corrosive Liquid, N.O.S. Cupric Chloride, Acid, NA1760	0 2 35 38 39 42		3 0	T
2	Copper Sulfate Crystals/ ORM-B	1 4		3 2 6 5	P
3	Copper Hydroxide from Regener- ation of Cupric Chloride/ORM-E	1 5		9 9 0 0	P
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number—see instructions)

All of these materials were benfically recycled under CFR 261.6

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1982

Date rec'd:

Rec'd by:

VII. GENERATOR'S EPA I.D. NO.

G A D 0 9 5 8 1 1 1 6 2 T/A C
1 2 13 14 15

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

C. P. INORGANICS

IX. FACILITY'S EPA I.D. NO.

I O L 0 6 2 4 8 0 8 5 0
16 28

X. FACILITY ADDRESS

INDUSTRY AVENUE
JOLIET, ILLINOIS 60435

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all transporters whose services were used during 1982. This section to be completed only once. Do not repeat on supplemental sheets.)

CHEMICAL LEMAN
INFINGER TRANSPORTATION CO.PAD 084770023
SCD003792744

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Ammoniated Copper Solution / UN 1760	02 35	38 39 42	1,260.0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

This material was beneficially recycled under CFR 261.6



Subsidiary of Kollmorgen Corporation

FILE COPY

May 24, 1983

RECEIVED

MAY 26 1983

ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

Betty Burns
Industrial and Hazardous Waste
Management Program
Land Protection Branch
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

Dear Ms. Burns:

As per our conversation of 5-23-83 I am enclosing documentation of disposal for all materials left on site by the former owners. I am also sending a copy of the letter dated October 12, 1982 in which these items were addressed. Manifests to support this letter were also sent to your department by certified mail. We attempted to trace the letter, but the postal department could not account for it. I regret this problem, and hope you receive everything in order this time.

The solder plating solution has just been pumped out of the plating machine and will be shipped to Chemical Waste Management along with our next shipment of metal hydroxide sludge. The shipment should fall into the first week of June timeframe. I will send a copy of the manifest as soon as the material is shipped off site.

Thank you for your help and cooperation in this matter. We look forward to continuing our relationship with the department.

Sincerely,

Rick DuVall

Rick DuVall
Environmental Engineer

B-36983



Subsidiary of Kollmorgen Corporation

JAN 05 1984
ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

January 3, 1984

Mr. J. Leonard Ledbetter
Industrial & Hazardous Waste Management Program
Environmental Protection Division
Room 724, 270 Washington St. S.W.
Atlanta, GA 30334

Dear Mr. Ledbetter:

Enclosed are the Identification Sheet and the Self Generated Hazardous Waste and Disposition forms, per your request of December 20, 1983.

If you have any further questions or I can be of any assistance, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Samuel E. Roberts".

Samuel E. Roberts
Process Engineer

SR/mn Enc.

Georgia Environmental Protection Division
GEORGIA ANNUAL HAZARDOUS WASTE REPORT
Reporting Period January 1 thru December 31, 1983
FORM A
IDENTIFICATION

Please print/type with Elite type (12 characters per inch)

I. EPA I.D. NUMBER G A D 0 9 5 8 1 1 1 6 2

II. NAME OF INSTALLATION
P H O T O C I R C U I T S A T L A N T A I N C .

III. INSTALLATION MAILING ADDRESS

3 5 0 D I V I D E N D D R I V E
Street or P.O.Box
P E A C H T R E E C I T Y G A 3 0 2 6 9
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than Section III. above)

S A M E
Street or Route Number
S A M E
City or Town State Zip Code
F A Y E T T E
County

V. INSTALLATION CONTACT

R O B E R T S S A M U E L
Name (last and first)
(4 0 4) 4 8 7 8 8 8 8
Phone No. (Area code & number)

VI. PROCESS IN USE (Check as appropriate)

SQG	GEN	TRN	T01	T02	T03	T04	S01	S02	S03	S04	D80	D81	D83
	X						X	X					

☒ PRIVATE (Handle only self generated waste) ☐ COMMERCIAL (Handle waste generated from other sources)

VII. CERTIFICATION - I certify under penalty of Law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles Marquardt - V.P.
Print/Type Name & Title Signature of Date Signed
Authorized Representative

Name of Installation: P H O T O C I R C U I T S - A T L A N I A - I N C .
 EPA I.D. Number: G A D 0 9 5 8 1 1 1 6 2

Form B

SELF-GENERATED HAZARDOUS WASTE AND ITS DISPOSITION

	F, O, O, 6	D, O, O, 2				
1. EPA HAZARDOUS WASTE NUMBER						TOTAL
2. On Hand, On-site on January 1, 1983	4.700	5.000				9.700
3. Generated during 1983	44.682	271.000				315.682
4. TOTAL AMOUNT FOR WHICH TO ACCOUNT	49.382	276.000				325.382
5. Shipped to State of Alabama	47.500					47.500
6. Shipped to State of South Carolina		66.000				66.000
7. Shipped to State of New Jersey		180.000				180.000
8. Shipped to State of						
9. Shipped to Georgia Facility for Use, Reuse, Recycle or Reclaim						
10. Shipped to Georgia Facility for Treatment, Storage, or Disposal						
11. Treated On-site						
12. Treatment Code						
13. Disposed of On-site						
14. Disposal Code						
15. On Hand, On-site on December 31, 1983	1.882	30.000				31.882
16. Storage Code	S01	S02				
17. Other (Explain)						
16. TOTAL AMOUNT OF DISPOSITION	49.382	276.000				325.382

Charles

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION
WASTE MANAGEMENT DATA SHEET

RECEIVED

FEB 3 1984

MUNICIPAL SOLID WASTE

NAME AND LOCATION OF FACILITY

Photocircuits Atlanta, Inc. *GA609581162*
350 Dividend Drive
Peachtree City, GA 30269

PERSON TO CONTACT

(ENTER THE NAME, ADDRESS, TITLE AND BUSINESS TELEPHONE NUMBER OF
THE PERSON TO CONTACT REGARDING INFORMATION SUBMITTED ON THIS FORM).

TOPK, IN
Samuel E. Roberts
Process Engineer
address as above
(404) 487-8888

DATES OF WASTE HANDLING

(ENTER THE YEARS THAT YOU ESTIMATE WASTE TREATMENT, STORAGE OR DISPOSAL
BEGAN AND ENDED AT THE SITE. IF YOU SELECTED A FACILITY OFF-SITE PLEASE
NOTE AND EXPLAIN IN "COMMENTS" SECTION.

Waste Treatment began 8/79 and has continued to present date
No storage or disposal has occurred on this site.

GENERAL TYPE OF WASTE

- | | |
|---------------------|------------------------------|
| 1- () ORGANICS | 7- (x) BASES |
| 2- () INORGANICS | 8- () PCB's |
| 3- (x) SOLVENTS | 9- () MIXED MUNICIPAL WASTE |
| 4- () PESTICIDES | 10- () UNKNOWN |
| 5- (x) HEAVY METALS | 11- () OTHER (SPECIFY) |
| 6- (x) ACIDS | |

WASTE QUANTITY (ESTIMATED)

250 tons/yr.

HAS THERE EVER BEEN A SPILL OR DISCHARGE OF A HAZARDOUS SUBSTANCE FROM YOUR
FACILITY? (BRIEFLY EXPLAIN THE NATURE OF THE RELEASE).

None under the ownership of Photocircuits.

COMMENTS

(IF THERE IS ANY COMMENTS THAT YOU BELIEVE WOULD CLARIFY THE PAST WASTE HANDLING PRACTICES OF YOUR FACILITY OR OF FACILITIES YOU SELECTED TO HANDLE YOUR WASTE, PLEASE ELABORATE IN THE SPACE PROVIDED).

Facility was purchased from Topri Inc. in April of 1982.

No waste is stored longer than 90 days.

No waste disposal at all. Waste sent out for disposal or recycle.

SIGNATURE AND TITLE Samuel E. Roberts Proc. Eng. (404) 487-
NAME TELEPHONE 8888

350 Dividend Drive
STREET

Peachtree City GA 30269
CITY STATE ZIP CODE

Samuel E. Roberts 1-31-84
SIGNATURE DATE



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

TRIP REPORT
March 23, 1984

SITE NAME & LOCATION: Photocircuits, Atlanta Corporation

TRIP BY: Alan R. Laros *AKL*

DATE OF TRIP: March 2, 1984 - 10:00 a.m.

OFFICIALS CONTACTED: Sam Roberts, Process Engineer, 350 Dividend Drive,
Peachtree City, Georgia 30269

REFERENCE: 1/26/84 letter from Photocircuits to Betty Burns

COMMENTS:

This facility manufactures circuit boards for use in various electronics industries, in the production of Sylvania television sets, Chrysler automobile radios, home computer sets, etc. The blank circuit boards are constructed of fiberglass and coated with a thin layer of copper.

The assembly line process starts with a mechanical burnishing of the copper surface. The board is then washed and dried and the circuits are laid out using a special ink. A cupric chloride-hydrochloric acid bath is used to remove excess copper, leaving only the ink-coated circuit. The ink is removed as the circuit boards are immersed in a 5% sodium hydroxide bath; this exposes the underlying copper circuit. The circuit board is again washed in dilute hydrochloric acid, is rinsed, masked and heated in a drying oven. The circuit legend is stenciled on the back of the circuit board and finally the surface is cleaned with copper bright cleaner.

Photocircuits has its own (totally enclosed) waste treatment plant through which the various (non-metal bearing wastes) acids, inks, etc., are channeled and a separate system through which (metal bearing wastes) copper residues are sent for treatment. Wastewater from both sources is automatically pH adjusted to between 6 and 9 prior to discharge into the Peachtree City POTW. Ferrous sulfate is added to the (metal bearing) waste stream in order to precipitate out the copper. The copper bearing sludge is caught in a special diatomaceous earth filter press. (Peachtree City allows .5 parts per million copper in the effluent but Photocircuits keeps it to about .1 parts per million copper.) The filter press sludge is 50% copper and 50% diatomaceous earth. This sludge is presently being removed from the filter every 4 to 6 weeks and put into special leakproof bags (each sludge-filled bag weighs 1800 lbs.). Chem Waste has been contracted to remove this waste for disposal at the rate of about 7 bags every 4 to 6 weeks. (NOTE: This waste is being tested for EP and leachable copper to see if it can be handled at a sanitary landfill as a special waste.)

Trip Report - Laros
Photocircuits, Atlanta
March 23, 1984
Page 2

All Cupric Chloride waste is piped into an 8000 gallon above-ground storage tank. The tank is enclosed inside a reinforced concrete sump with 18" highwalls. Every 4-6 weeks this waste is removed by Madison Industries of Woodbridge, New Jersey. This facility recovers copper from the cupric chloride.

Certain solvents such as toluene and xylene are used in plant processes but there is no waste resulting from its use. Photocircuits is not storing any hazardous waste inside its container storage area, only raw product solvent and empty containers. J.V.B. Smith Company removes all empty 55 gallon drums for the purpose of reconditioning. All non-hazardous solid waste is disposed by Browning Ferris and scrap metal is removed for recycling by Southern Foundry.

CONCLUSIONS:

This facility qualifies as a generator of hazardous waste and has the option of withdrawing the Part A application for treatment and storage of hazardous waste. The waste treatment system is totally enclosed and is therefore permitted by Rule as per §266. This system was found to be in good condition and is inspected daily by Mr. Roberts for evidence of leaks or other problems. The filter press sludge is not a listed waste and pending EP testing it may be recommended that this sludge be handled by a local sanitary landfill as a special waste.

RECOMMENDATIONS & FOLLOW-UP REQUIRED:

Following receipt of my inspection report and compliance status letter this facility plans to request withdrawal of their Part A application.

PHOTOGRAPHS: None

REVIEWED BY: *ALC*

ATTACHMENTS: None

File: Photocircuits, Atlanta Corp. (R)

AL:mg:3260B



Subsidiary of Kollmorgen Corporation

file: Potorciuitsce.

MAY 7 1984

ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

May 2, 1984

Ms. Jennifer R. Kaduck, Unit Coordinator
Facilities Compliance Unit
Industrial & Hazardous Waste Management Program
Department of Natural Resources
Environmental Protection Division
270 Washington St. S.W.
Atlanta, GA 30334

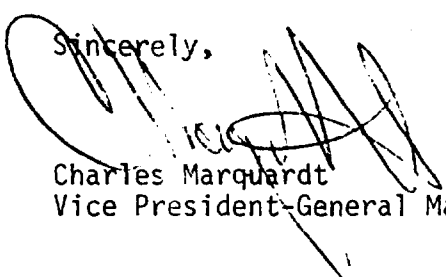
Dear Ms. Kaduck

In reference to your letter of March 22, 1984, enclosed are the laboratory results from E.P. and leachable copper test of our sludge. Please let me know if the waste may be disposed in a sanitary landfill.

Photocircuits Atlanta, Inc. requests that its Part A application for TSD status with the Environmental Protection Division of Georgia be withdrawn. We request that our EPD identification number remain the same in our status as a generator of hazardous waste.

Should you have any questions please feel free to contact Sam Roberts at (404)487-8888.

Sincerely,


Charles Marquardt
Vice President-General Manager

CRM:mn

Enclosures

N.W. Walls
President

J.B. Hamilton
Vice President



F.A. Williams
Secretary
W.P. Hillman
Comptroller

PROJECT No.: 202

ATTN: NAME	Steven Chapman		
ADDRESS	350 Dividend Drive		
CITY AND STATE	Peachtree City, Georgia	ZIP	30269

```
*****
Sample Description      Type (water-soil-tissue): solid    Sampled by:
                                                                Sold by:
Date                   Date             Date              Date
Sampled: 4/4/84        Received: 4/4/84     Due: 4/10/84         Promised:   ASAP
```

P.O. No. _____ Date Completed: _____

ABI Number	Station	Test Required	Results
5905		EP tox preparation	
		Cu	875.00 ppm
		As	<0.001 ppm
		Ba	1.5 ppm
		Cd	0.076 ppm
		Cr	<0.05 ppm
		Pb	<0.1 ppm
		Hg	<0.001 ppm
		Se	<0.002 ppm
		Ag	<0.01 ppm

Steve M. Tsoukalas
Steve Tsoukalas, Ph.D.
Director of Chemistry

306 CREIGHTON DRIVE
WEST COLUMBIA, SC 29169
TELEPHONE (803) 791-5458

1458 SUNVIEW TERRACE - P.O. BOX 974
JENSEN BEACH, FL 33457
TELEPHONE (305) 334-3729



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.

ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

May 24, 1984

Mr. Charles Marquardt
Vice President-General Manager
Photocircuits Atlanta, Inc.
350 Dividend Drive
Peachtree City, Georgia 30269

FILE COPY

RE: Request for Facility Status Change for the
Photocircuits - Atlanta plant, Peachtree City, GA
EPA ID# GAD095811162

Dear Mr. Marquardt:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility Permit.

Based on the information provided withdrawal of your application is warranted and your permit application has been placed in our inactive files.

As requested, your status has been changed to a hazardous waste generator and your EPA Identification Number has been retained. (Note: as a generator of hazardous waste you will be required to comply with Part 262 of Georgia's Rules for Hazardous Waste Management).

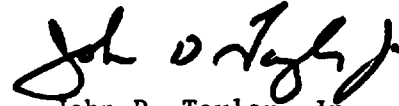
Please be advised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities under authority of Section 8 of the Georgia Hazardous Waste Management Act and Section 391-3-11-.10 and .11 of Georgia's Rules for Hazardous Waste Management.

Page Two (2)
Mr. Charles Marquardt
May 24, 1984

If further clarification is needed on this matter, please feel free to contact Alan Laros at 404/656-7802.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Taylor, Jr.", written in a cursive style.

John D. Taylor, Jr.
Program Manager
Industrial & Hazardous Waste
Management Program

JDT:alb:14

cc: James Scarbrough
Howard Barefoot
Alan Laros
File: Photocircuits (R)



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

August 6, 1984

J. LEONARD LEDBETTER
Division Director

Mr. Roy Evans
Evans Landfill, Inc.
P.O. Box 193
Riverdale, Georgia 30274

FILE COPY

RE: Request for Information on Disposal of Waste
Water Treatment Sludge

Dear Mr. Evans:

We have reviewed the data submitted by Photocircuits regarding the sludge generated by their waste water treatment plant. All EP Toxicity parameters were well below the maximum concentrations for contaminants listed in Georgia's Rules for Hazardous Waste Management 261.24. The additional tests for leachable Copper concentrations indicate (875.00 ppm). Although this reading is quite high, Copper is not regulated under the Georgia Hazardous Waste Management Act. The drinking water quality criteria allows 1 ppm Copper, but only based on taste.

Therefore, being non-hazardous we have no objection to disposal of this waste in the state approved Evans Sanitary Landfill provided that:

- 1) The sludge is handled as special waste and kept bound in the same type nylon bags presently being used for shipment of this material to Chemical Waste Management.
- 2) The waste must be disposed either in a separate area of the sanitary landfill or buried in the daily working face in such a way as to keep the nylon container intact.

Should you need additional information, please call 404/656-7802.

Sincerely,

Alan R. Laros
Environmental Specialist
Industrial & Hazardous Waste
Management Program

AL:djb:24
cc: James Dunbar
Betty Burns
File: Photocircuits (R)

FILE: photocircuits Atlanta (2)

GEORGIA DEPARTMENT OF NATURAL RESOURCES
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334



LAND PROTECTION BRANCH
Industrial & Hazardous Waste
Management Program
(404) 656-7802

GENERATOR STANDARDS INSPECTION CHECKLIST

SECTION I. FACILITY INFORMATION

SIC 3679 TSD? X Yes No Transporter? X Yes No INSPECTION DATE: 10/19/84
Facility Name Photocircuits Atlanta I.D. No. GAD095811162 Fayette County
Address 350 Dividend Drive City Peachtree Zip 30269 Telephone Number 404/487-8888
Name of Owner/Operator Kollmorgen Corporation Inspector's Signature Petty Burns

SECTION II. INSPECTION SUMMARY & REVIEW

Reason for Inspection: X Routine Other

Discussed with:

Name: Sam Roberts Title: Process Engineer
Address: Same as above Telephone: _____
Name: _____ Title: _____
Address: _____ Telephone: _____

Copy of this report submitted to:

Name: Sam Roberts Title: Process Engineer
Address: Same as above Telephone: _____
Name: Charles Marquardt Title: Plant Manager
Address: _____ Telephone: _____

Photographs: yes X no: No. _____

Samples collected: yes X no: No. _____ Split yes no

Summary of Findings:

The hazardous waste observed on-site, Cupric Chloride (D002), is exempt from the requirements of 391-3-11-.08/40 CFR Subpart 262 as delineated in Chapter 391-3-11-.07/40 CFR Subpart 261.6.

The facility indicated that future plans would change waste generation status and wishes to remain a generator.

Reviewed by: Hanna S. Bausert Review date: 11/30/84

Attachments:

SECTION III. GENERATOR CHECKLIST

	MEETS REQUIREMENTS		
	Yes	No	N/A
1. Facility notified as a generator and has obtained an EPA ID #? (262.12)	X		
2. Facility has identified all wastes as hazardous or non-hazardous? (262.11)	X		
3. Facility stores waste in containers for less than 90 days (262.34)(265 Subpart I)			X
(a) drums in good condition, no leaks,			
(b) compatible with waste?			
(c) drums kept closed during storage			
(d) drums inspected weekly			
(e) ignitable or reactive waste stored \geq 50 ft. from property line?			
(f) incompatible wastes separated by dike or berm?			
(g) date of accumulation period clearly marked on each container.			
4. Facility stores wastes in tanks for less than 90 days (262.34) (265.17 and 265, Subpart J)			X
(a) are ignitable or reactive wastes separated from sources of ignition?			
(b) are wastes handled so as to prevent rupture, leaks, etc.			
(c) if tank is uncovered, is there \geq 2 feet freeboard or a containment structure?			
(d) if continuous feed, is there a means to stop inflow?			
(e) is discharge control equipment, monitoring equipment, tank level inspected daily?			
(f) is tank construction and any discharge confinement structure inspected weekly?			
(g) ignitable or reactive wastes treated, rendered, or mixed to be non-ignitable or non-reactive <u>or</u> protected from ignition or reaction <u>or</u> tank used only for emergencies?			
(h) covered tanks storing ignitable or reactive wastes comply with buffer zone requirements			
(i) facility does not store incompatible wastes in same tank?			

5. Wastes are manifested properly? (262.20)
6. Each container/tank is marked "Hazardous Waste" during accumulation. (262.34)
7. Wastes are labelled, marked "Hazardous Waste" (49 CFR 172.304) and placards offered to transporter prior to transport? (262.30)
8. Facility is operated and maintained to minimize possibility of fire, explosion, or release of hazardous waste to the environment. (262.31)
9. Facility has the following equipment to deal with hazards posed by waste handled: (265.32)
 - (a) alarm system
 - (b) telephone or 2-way radio
 - (c) fire extinguishers
 - (d) water
10. Facility tests and maintains above equipment as necessary. (265.33)
11. Personnel have immediate access to communications or alarm systems (265.34)
12. Adequate aisle space maintained. (265.35)
13. Arrangements with local authorities have been made to familiarize them with facility, designated response authority, etc. (265.37)
14. Contingency plan written (265.51). If yes: contingency plan includes (265.51)
 - (a) facility personnel action responses
 - (b) describes local authorities agreements
 - (c) lists names, addresses, phone #'s of emergency coordinators, designates primary emergency coordinator, and lists others in order of assumption of responsibility
 - (d) lists all emergency equipment at the facility, location, physical description and capabilities
 - (e) includes an evacuation plan for facility personnel
 - (f) copies of contingency plan submitted to police, fire department, hospital, local emergency response teams
 - (g) contingency plan amended when necessary
 - (h) at least one emergency coordinator is on facility premises or on call
 - (i) Emergency coordinator responds immediately to emergencies. (265.56)

Yes	No	N/A
		X
		X
		X
X		
X		
	X	
X		
X		
X		
X		
	X	
X		
	X	
	X	
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X		
	X	
	X	
	X	
X		
	X	
	X	
X		
X		
X		

15. Facility has a personnel training program of classroom instruction or
OJT? (265.16) If so:
- (a) training is directed by person trained in hazardous waste management procedures
 - (b) personnel complete training within 6 months of employment or assignment
 - (c) personnel take part in annual review of training
 - (d) the following documents are maintained:
 - 1. job title and name of employee
 - 2. job description
 - 3. amount and type of initial and continuing training to be given each person filling a position
 - 4. documentation of training as job experience given to and completed by personnel
 - 5. records kept until closure or 3 years past employment of individual personnel
16. Manifest records, exception reports, annual reports, test results, and waste analyses are kept for 3 years (262.40)
17. Annual reports submitted (262.41)
18. Exceptions reports submitted (262.42)
19. Are wastes exported or imported? (262.50)
If yes, refer to 262.50 for a list of requirements

Yes	No	N/A
	X	
X		
X		
		X
		X



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

TRIP REPORT

October 30, 1984

Site Name & Location: Photocircuits Atlanta
Peachtree City, GA

Trip By: Betty Burns

Accompanied By: None

Date of Trip: 10-19-84

Officials Contacted: Sam Roberts, Process Engineer

Reference: Facility File/Letter of May 24, 1984 from John Taylor To
Photocircuits Atlanta

Comments:

On May 24, 1984, Photocircuits Atlanta's hazardous waste activity status was changed from a TSD facility to a generator. The subject inspection was conducted to determine the company's compliance status with Chapter 391-3-11-.08/40 CFR §262.

The company manufactures circuit boards of simple design with process treatment on copper clad laminates as noted below:

1. Oxidation removed with Hydrochloric Acid
2. Water rinse
3. Dried
4. Ink Pattern Printed
5. Dried
6. Copper Etched with Cupric Chloride
7. Ink removed with Sodium Hydroxide
8. Dried
9. Oxidation removed with Hydrochloric Acid
10. Water Rinsed
11. Dried
12. Solder mask applied
13. Dried
14. Flux or Roll Solder applied using solvent thinners of Ethyl Acetate and Isoprophyl alcohol.

Page Two (2)

TRIP REPORT - Photocircuits Atlanta

October 30, 1984

The company generates three waste streams from its manufacturing operation as noted below:

1. Wastewater treatment sludge is generated from washing copper off circuit boards. This waste contains precipitated metals, cleaning solutions and soaps. Approximately 50 tons of the sludge is generated from 7 filter presses per month. The material is transported by Barton Enterprises to the Crymes Sanitary Landfill, Gwinnett County, once per month for disposal. This sludge has been classified as non-hazardous (see file letter dated June 22, 1984).
2. Cupric Chloride solution is generated from etching copper off circuit boards. The material is maintained at the plant in 3 to 4 ten thousand gallon storage tanks. Approximately 20 tons of the Cupric Chloride is generated on-site per week. The material, classified as EPA Waste D001 is transported by commercial tanker once per week for recycling at Madison Industries, Woodbridge, New Jersey.
3. Dumpster waste consist of scrap circuit boards, plastic, paper and domestic garbage. Approximately 32 tons of this waste is disposed of at the Fayette County Sanitary Landfill per week.

Attached are two flow charts showing the company's processing operation, waste water flow lines and waste water treatment system.

The company official, Mr. Roberts, stated that the company is not effecting hazardous waste management activities that are subject to 40 CFR 262 but, plan to incorporate an electroplating process. For the aforesated reason, the facility would like to retain it's generator status.

Conclusions:

1. The company's only hazardous waste activity, which includes the off-site reclamation of Cupric Chloride (D002), is exempt from the requirements of Chapter 391-3-11-.08.
2. The facility is operating in violation of, and must comply with the following requirements:

40 CFR §262.34(a)(4) "Accumulation Time", because your facility had not implemented/documented a Personnel Training program as required by 40 CFR §265.16.

40 CFR §262.34(a)(4) "Accumulation Time", because your facility had not made arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations as required by 40 CFR §265.37.

Page Three (3)
TRIP REPORT - Photocircuits Atlanta
October 30, 1984

40 CFR §262.34(a)(4) "Accumulation Time", because your facility's Contingency Plan does not adequately describe the actions facility personnel must take to comply with §§265.51 and 265.56 as required by 40 CFR §265.52(a).

40 CFR §262.34(a)(4) "Accumulation Time", because your facility's Contingency Plan does not describe arrangements agreed to by local police departments, fire departments and hospitals to coordinate emergency services, pursuant to 40 CFR §265.37 as required by 40 CFR §265.52(c).

40 CFR §262.34(a)(4) "Accumulation Time", because your facility's Contingency Plan does not specify the primary coordinator as required by 40 CFR §265.52(d).

40 CFR §262.34(a)(4) "Accumulation Time", because your facility's Contingency Plan does not describe evacuation routes as required by 40 CFR §265.52(f).

40 CFR §262.34(a)(4) "Accumulation Time", because your facility had not submitted copies of the Contingency Plan to all local police departments, fire departments and hospitals as required by 40 CFR §265.53(b).

Recommendations & Follow-Up Required: Send the company a Notice of Violation.

Photographs: None

Reviewed By: *PR 11/1/84*

Attachments: Contingency Plan
Flow Charts (2)

BB:jrh:0314R

cc: Betty Burns

File: Photocircuits Atlanta (R)



Department of Natural Resources

270 WASHINGTON ST., S.W.

ATLANTA, GEORGIA 30334

(404) 656 3500

J. LEONARD LEDBETTER

COMMISSIONER

January 11, 1985

Mr. Samuel E. Roberts
Process Engineer
Photocircuits Atlanta
350 Dividend Drive
Peachtree City, Georgia 30269

RE: Compliance Status
Generator Requirements
Photocircuits Atlanta
GAD095811162

Dear Mr. Roberts:

Reference your data submission of December 3, 1984 wherein you addressed the violations outlined in our November 6, 1984 Notice of Violation letter to you.

Based on the December 3, 1984 data submission reviewed by this office, we have concluded that the item listed below has not been satisfactorily addressed:

40 CFR §262.34(a)(4) "Accumulation Time", because your submission does not document that a copy of your facility's Contingency Plan has been submitted to the local hospital as required by 40 CFR Subpart D, §265.53(b).

Please submit to this office prior to February 15, 1985 documentation demonstrating that the above noted deficiency has been corrected.

Your interest in protecting Georgia's environment is appreciated. If further assistance is required, please feel free to call Betty Burns at (404) 656-7802.

Sincerely,

Howard L. Barefoot
Unit Coordinator
Industrial & Hazardous Waste
Management Program

HLB:bbw:029

cc: Betty Burns

Jennifer Kaduck

File - Photocircuits Atlanta - (R)

File Photocircuits Atlanta, Georgia

CONTINGENCY PLAN

PHOTOCIRCUITS ATLANTA

1. UNIT: Bulk Chemical Storage - Back (Area "A")
2. In case of emergency - sudden rupture of storage tanks, fire, or explosion contact:
 1. Sam Roberts 874-9721 (home)
 2. Jay Butter 487-8568 (home)
 3. James Griffeth 251-9773 (home)
 4. Blount Ferrell 599-3002 (home)
 5. Photocircuits Atlanta Emergency Team
*If necessary the above will call:
 - *6. Fire Department 487-7999
 - *7. Police Department 487-7977
3. For non-sudden releases - leaks or pump failure contact:
 1. James Griffeth 251-9773 (home)
 2. Tony McGee 487-9495 (home)
 3. James Parker 229-1011 (home)
4. Description of Safety and Control Equipment -
 - 4.1 Tanks are labeled with NFPA - Hazardous material classification code indicating health hazard, flammability and reactivity.
 - 4.2 Spill containment mound around all tanks.
 - 4.3 Safety showers and eyewash to decontaminate personnel.
 - 4.4 Emergency team phone dial 43.
 - 4.5 Fire extinguishers.
 - 4.6 Scott Air Pack.

5. Hazards Involved -

Acids

- 5.1 Hydrochloric Acid - Causes serious burns, vapors are hazardous, non-flammable, generates heat on contact with water, and dilutes with water.
- 5.2 Cupric Chloride - Causes serious burns, non-flammable, generates heat on contact with water, and dilutes with water. Toxic if ingested.
- 5.3 Isopropyl Alcohol - Causes irritation if contacted with the eyes. Flammable. Produces nausea, vomiting, and abdominal pain if ingested.
- 5.4 Ethyl Acetate - Causes irritation if contacted with eyes. Toxic if ingested. Flammable.

6. In case of sudden release -

- 6.1 Sprayed individuals must shower immediately.
- 6.2 Hydrochloric acid - Collected in diked area, pumped into tank or drums. Dilute remainder and neutralize with alkali. Transfer to waste treatment.
- 6.3 Cupric Chloride - Pump into spent tank or drums. Dilute remainder and neutralize with alkali. Transfer to waste treatment.
- 6.4 Isopropyl Alcohol - Pump into a secondary tank or drum. Material will be redistilled and used in production.
- 6.5 Ethyl Acetate - Pump into a secondary tank or drum. Material will be redistilled and used in production.

For non-sudden releases -

- 6.6 Small spills or leaks should be dried up with sawdust and disposed of with hazardous waste.

CONTINGENCY PLAN
PHOTOCIRCUITS ATLANTA

UNIT: Chlorine Storage Area - (Area "B")

1. In case of emergency - sudden rupture of cylinders, fire, or explosion contact:
 1. Sam Roberts 874-9721 (home)
 2. Jay Butter 487-8568 (home)
 3. James Griffeth 251-9773 (home)
 4. Blount Ferrell 599-3002 (home)
 5. Photocircuits Atlanta Emergency Team
*If necessary, the above will call:
 - *6. Fire Department 487-7999
 - *7. Police Department 487-7977
2. For non-sudden releases - leaks or pump failure, contact:
 1. James Griffeth 251-9773 (home)
 2. Tony McGee 487-9495 (home)
 3. James Parker 229-1011 (home)
3. Description of Safety and Control Equipment -
 - 3.1 Tanks are labeled with NFPA - Hazardous Material Classification Code indicating health hazard, flammability, and reactivity.
 - 3.2 Safety Valve - Prohibits gas flow unless a vacuum is to the line.
 - 3.3 Area is fenced.
 - 3.4 Emergency team dial 43.
 - 3.5 Ranger Air Pack
4. Hazards Involved -
 - 4.1 Chlorine Gas - Chlorine gas attacks the upper respiratory tract and bronchi during initial exposure; this damage can inhibit oxygen exchange in the lungs. Highly toxic. Gas is an irritant to the skin. May react violently with many inorganic and organic materials.

5. In case of sudden release -

5.1 Evacuate personnel

5.2 Notify fire department

5.3 Approach with self-contained breathing apparatus and protective clothing only.

For non-sudden releases -

5.4 Approach with self-contained breathing apparatus and seal leak.

CONTINGENCY PLAN

PHOTOCIRCUITS ATLANTA

1. UNIT: Bulk Chemical Storage - Pollution Control (Area "C")
2. In case of emergency - sudden rupture of storage tanks, fire, or explosion contact:
 1. Sam Roberts 874-9721 (home)
 2. Jay Butter 487-8568 (home)
 3. James Griffeth 251-9773 (home)
 4. Blount Ferrell 599-3002 (home)
 5. Photocircuits Atlanta Emergency Team
*If necessary, the above will call:
 - *6. Fire Department and Rescue 487-7999
 - *7. Police Department 487-7977
3. For non-sudden releases - leaks or pump failure, contact:
 1. James Griffeth 251-9773 (home)
 2. Tony McGee 487-9495 (home)
 3. James Parker 229-1011 (home)
4. Description of Safety and Control Equipment -
 - 4.1 Tanks are labeled with NFPA - Hazardous material classification code indicating health hazard, flammability, and reactivity.
 - 4.2 Spill sump around all tanks.
 - 4.3 Safety showers and eyewash to decontaminate personnel.
 - 4.4 Emergency team phone dial 43.
 - 4.5 Fire extinguishers.
 - 4.6 Scott Air Pack

5. Hazards Involved -

Acids

5.1 Sulfuric Acid - Causes serious burns, non-flammable, generates heat on contact with water. Vapors harmful. Dilutes with water.

Alkali

5.2 Sodium Hydroxide - Causes serious burns, non-flammable, generates heat on contact with water. Dilutes with water.

6. In case of sudden release -

6.1 Sprayed individuals must shower immediately.

6.2 Alkali must be diluted with water then neutralized with acid. Material should then be pumped through waste treatment.

6.3 Acids must be diluted with water and neutralized with alkali. Material should then be run through waste treatment.

For non-sudden releases -

6.4 Small spills and leaks should be absorbed with sawdust and disposed of with hazardous waste.

Photo Guide

Waste, in the City, Va.

*Gen. Counselor
Inspection on 10/17/88*

OPERATOR TRAINING PROGRAM

Tank Farm Area "A"

1. CUPRIC CHLORIDE - (CuCl_2) A corrosive acidic liquid which causes serious burns when contacted. It is non-flammable, generates heat on contact with water, and dilutes with water.
2. In case of a spill, notify persons according to the contingency plan. The dike area will contain spilled cupric chloride. Spilled material will then be diluted and pumped to the waste treatment facility.
3. In case of fire or explosion, notify persons according to the contingency plan. There are no explosion hazards associated with cupric chloride.
4. Ground water contamination is possible if cupric chloride is released from the dike area. Sawdust or quik-dry can be used to prevent the flow of cupric chloride into the storm drain located at the bottom of the drive adjacent to the tank farm. If contamination does occur, dilute the cupric chloride with large amounts of water.
5. To shut down the tank farm area, cut off the following switches in the tank farm:
 1. Pump #1
 2. Pump #2

Seal the diaphragm valves at the base of each of the storage tanks.

6. Always wear rubber gloves and boots when working with cupric chloride. Wear approved safety glasses for eye protection. Avoid direct inhalation of fumes.

PRELIMINARY ASSESSMENT
TELEPHONE CONVERSATION RECORD

Site Name: Photocircuits Atlanta, Inc. I.D.# GAD09521162

Location Address: 350 DIVIDEND DRIVE ; PEACHTREE CITY, GA. 30269

Phone: (404) 487 - 8228.

Contact: Mrs. Margaret Zuga Title: Process Engineer

Address: 350 DIVIDEND DRIVE ; PEACHTREE CITY, GA. 30269

Phone: (404) 487 - 8228.

Authority: Section 3012 of CERCLA, Comprehensive Environmental Response, Compensation and Liability Act.

Facility has notified EPA via - RCRA 3001 site is in HWDMS
CERCLA 103c site is in NOTIS

Need Information concerning waste generation and disposal prior to Nov. 19, 1980.

How long has facility been in operation? _____

What kind of _____ Spoke with Ms. Zuga. She stated that
_____ Topric was owned by Tokai Print Industries,
_____ and that further information about disposal
_____ practices had to be acquired about from
_____ Japan. She also stated that Topric

Was it disposed _____ Industries operated the facility in June
_____ of 1979 for 6 months, then closed down
_____ operations. Wastes were left on site

Was it transported _____ by Topric Industries and Photocircuits
_____ Atlanta, Inc. disposed of wastes that

Was it treated _____ were left on site. Photocircuits has no
_____ knowledge of U.S. contacts.

Have there been any past spills? Describe.

Date of call: 10-21-85
10-22-85

Time: 11:05 AM, (Left Message)
Spoke with Ms. Margaret Zuga
(2:02 PM)

J. A. Knowles

OVERSIZED

DOCUMENT